

# **Exhibit 112**

## **Part 1**

**ATLANTA**  
Corporate Headquarters  
3942 Lakefield Court  
Suwanee, GA 30024  
(770) 866-3200 FAX (770) 866-3229



**ANALYSIS REPORT**  
**MAS Project # M70484**  
**Lisa Zimmerman's JBP Containers**



Prepared by:

William E. Longo, Ph.D

Materials Analytical Services, LLC  
3945 Lakefield Court  
Suwanee, Georgia 30024

February 24, 2020

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## PROJECT SUMMARY

This report includes the results of analyses for the two Lisa Zimmerman Johnsons' Baby Powder (JBP) samples that were submitted by the law firm of Simon Greenstone Panatier and received by MAS, LLC on May 16, 2020.

The two JBP Zimmerman samples were logged in at MAS on May 16, 2020 and assigned MAS laboratory project identification number M70484 and sample numbers 001-002, respectively. Figures 1 through 2 are representative images of the sample containers taken at MAS.

## SAMPLE DESCRIPTION

A description of the received samples are as follows:

<u>MAS No.</u>	<u>Client No.</u>	<u>Date of Manuf.</u>	<u>Description</u>	<u>Weight of Talcum Powder in Container</u>
M70484-001	SGP 487779	1994	JBP 15 oz.	260 grams
M70484-002	SGP 445997	2014	JBP 1.5 oz.	20 grams

The two Zimmerman JBP samples were analyzed for the possible presence of amphibole asbestos (tremolite & anthophyllite) by PLM (ISO & Blount) as well as ATEM with heavy liquid separation (HLS). Also, the two JBP Zimmerman JBP samples were analyzed for the presence of chrysotile asbestos using the HLS method developed by the Colorado School of Mines (CSM) provide to J&J in 1973.<sup>1,2</sup>

## OVERVIEW

The two Lisa Zimmerman JBP containers were examined by polarizing light microscopy by both the ISO 22262-1 PLM (w/o HLS) and the Blount method with HLS. Additionally, the two JBP samples were analyzed by the CSM's method using HLS and iodine staining for the sample preparation.

For the analytical transmission electron microscopy (ATEM), the samples were first prepared by the ISO-22262-2 heavy liquid (HLS) talc analysis method. For the ATEM analysis, suspected amphibole asbestos structures were analyzed by the three-step method: 1) morphology, 2) energy dispersive

<sup>1</sup> Colorado School of Mines Research Institute February 26, 1973 Report Re: Mineralogical Examination of Five Talc Samples to W.H. Ashton from W.P. Reid and W.T. Caneer

<sup>2</sup> Colorado School of Mines Research Institute April 2, 1973 Report re: Mineralogical Examination of Four Samples for Tremolite and Chrysotile from W.P. Reid to W.H. Ashton



x-ray spectroscopy (EDXA) and 3) selected area electron diffraction (SAED), for the verification of fibrous amphibole asbestos.

The overall results showed that the two JBP samples were found to be below the detection limit for amphibole asbestos using the ISO 22262-1 & Blount PLM methods as well as for the ISO 22262-1&2 ATEM HLS method. For the PLM-CSM method, both of the Zimmerman JBP containers were found to be positive for chrysotile asbestos. The estimated chrysotile weight percent for JBP container M70484-001 was 0.01 to 0.10 wt.% and for M70484-002 was 0.001 to 0.01 wt.%

Additionally, fibrous talc was detected in each of the two samples (moderate to abundant) by the three different PLM methods (ISO, BL, & CSM).

## **MATERIALS & METHODS**

### **Muffle Furnace**

Approximately 1 to 2 grams of the two talcum powder (Sartorius Research Balance) was removed from each of the two JBP containers and placed in individual 12 ml glass scintillation vials. The scintillation vials were then placed in a Fisher Scientific Iso-temp muffle furnace Model #620 at 400°F for a minimum of 4 hours to remove any organic material.

### **PLM - ISO 22262-1 Method (w/o HLS Sample Preparation)**

Approximately 100 milligrams from each of the two muffled JBP samples were analyzed by the ISO 22262-1 PLM method.<sup>3</sup> Three mounts each of the two JBP samples were placed on two glass slides, a drop of the 1.602 refractive index fluid is placed onto each of the three JBP mounts, stirred with the point of a scalpel blade and then covered with an 18 x 18 mm glass cover slip. The entire area of the three coverslip mounts was examined (972 mm<sup>2</sup>). Positive identification of amphibole asbestos bundles is then done by morphology, refractive indices, elongation, angle of extinction and birefringence as described by the ISO 22262-1 PLM method.

If samples are positive for regulated asbestos structures, a visual estimation of the quantity of asbestos observed is based on visual calibration through review of past NVLAP proficiency rounds which are lab generated weight percent standards provided by RTI International. Visual calibration is augmented by the use of area percent charts.

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<sup>3</sup> ISO 22262-1: 2012E Air Quality Bulk Materials Part 1: Sampling and Qualitative Determination of Asbestos in Commercial Bulk Samples.

**PLM – Blount Method (with HLS Sample Preparation)**

An aliquot of approximately 100 mg (Sartorius Research Balance) from each of the two muffled JBP samples were placed into separate labeled Eppendorf micro-centrifuge tubes (MCT) (Premium 1.2mL MCT Graduated Tubes Cat. No. 02-408-12).<sup>4</sup>

Approximately 1.2 ml of HLS (Lithium heteropolytungstates solution, GeoLiquids, Inc., Cat. No. LST010 with a stated density 2.82 g/cc) was diluted with distilled water to a density of 2.810 as determined by a VWR Hydrometer, model number 34620-1109, was added to each MCT containing the JBP talcum powder samples and mixed with a disposable mixing rod for 10 to 20 seconds. The combined talc and HLS (density 2.810 grams/cc) samples were placed into a vacuum desiccator (JEOL EMDSC-U10A) to remove air bubbles for 3 minutes at a pressure of approximately 8 torr prior to centrifugation.

The MCT sample tubes were then placed in an Eppendorf micro-centrifuge (Model No. 2412D) set at 7,000 RPM for total of 10 minutes at room temperature. After removal of the MCT tubes from the centrifuge, the talc/heavy liquid was pipetted off the top of the centrifuge tubes, and distilled water was added back, mixed and re-centrifuged as described above. This step was repeated two more times. After the third centrifugation/heavy liquid removal step, the heavy particles were removed from the bottom of the centrifuge tubes with a pipette; several drops of water containing the heavy particles were transferred to a glass microscope slide and allowed to dry. The heavy particle residue on the glass slide was then analyzed by the ISO 22262-01 PLM method as described above.

In addition to the determination of regulated amphibole asbestos structures, each of the JBP samples were also examined for amphibole cleavage fragments and fibrous talc. The verification of fibrous talc was done with a RI fluid of 1.55.

**PLM – CSM Method (with HLS Sample Preparation)**

An aliquot of approximately 1 gram (Sartorius Research Balance) from each of the two JBP samples were placed into individual 12 ml glass scintillation vials then approximately 5 to 10 ml of 1.0% iodine solution (Betadine Lot:81180-128) is added mixed and inverted by hand for 5 to 10 seconds. The scintillation vial/talcum powder/iodine solution is then placed on a vortex mixer (Fisher-Scientific Model #232 for 5 to 10 seconds. After mixing the scintillation vials are then placed in a water bath at 100°C for 1.5 to 2 hours. The talcum/iodine solution in the scintillation vial is rinsed onto a 47 mm

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<sup>4</sup> Process Mineralogy IX: The Minerals, Metals & Materials Society, 1990, A.M. Blount "Detection and Quantification of Asbestos and Other Trace Minerals in Powdered Industrial-Mineral Samples", pp. 227-270.

MCE filter (0.4 micron pore size) with 15 ml of 50/50 solution of methanol and DI water. This step is repeated just DI water until the talcum powder on the filter turns from amber brown to white. This step usually takes 3 to 5 washes. The filter containing the talcum powder is allowed to dry for 20 to 30 minutes.

### **CSM/HLS PLM Method**

Approximately 200 grams of the iodine stained talcum powder, from each of the two JBP talcum powder samples is transferred to a 15 ml centrifuge tube (VWR 10026-076). Approximately 15 ml of HLS (Lithium heteropolytungstates solution, GeoLiquids, Inc., Cat. No. LST010 with a stated density 2.82 g/cc) was diluted with distilled water to a density of 2.72 as determined by a VWR Hydrometer, model number 34620-1109, was added to each VWR-T containing the JBP talcum powder samples and mixed with a disposable mixing rod for 10 to 20 seconds. The combined talc and HLS (density 2.72 grams/cc) samples were placed into a vacuum desiccator (JEOL EMDSC-U10A) to remove air bubbles for 3 minutes at a pressure of approximately 8 torr prior to centrifugation.

The VWR-Ts were then placed in a Clay Adams Dynac II centrifuge set at 500 RPM for total of 10 minutes at room temperature without braking, once the centrifuge comes a full stop the RPMs are reset to 1800 for 10 minutes without braking. After removal of the VWR-Ts from the centrifuge, the bottom heavy mineral pellet is flash frozen in liquid nitrogen and the supernatant light minerals/heavy liquid is decanted on to a new 47 mm MCE (0.4 micron pour size) was washed with approximately 15 ml distilled water. This step was repeated two more times. The final MCE filter is allowed to dry for 20 to 30 minutes. After drying, the talcum powder sample is provide to the PLM analyst.

Three mounts each of the two JBP samples were placed on two glass slides, a drop of the 1.55 refractive index fluid is placed onto each of the three JBP mounts, stirred with the point of a scalpel blade and then covered with an 18 x 18 mm glass cover slip. The entire area of the three coverslip mounts was examined (972 mm<sup>2</sup>). Positive identification of chrysotile asbestos bundles is then done by morphology, refractive indices, elongation, angle of extinction and birefringence as described by the ISO 22262-1 PLM method.

**ATEM Sample Preparation: ISO 22262-2 (with HLS Sample Preparation)**

Approximately 30 mg (Sartorius Research Balance) from each of the two JBP samples were placed into separate, labeled Eppendorf micro-centrifuge tubes (MCT) (Premium 1.2 ml MCT Graduated Tubes Cat. No. 02-408-12).<sup>5</sup>

Approximately 1.2 ml of heavy liquid (Lithium heteropolytungstates solution, GeoLiquids, Inc., Cat. No. LST010 density 2.85 g/cc) was added to each MCT containing the talc samples, prepped and mixed with a disposable mixing rod for approximately 10 to 20 seconds. The combined talc and LST heavy liquid samples were then placed into a vacuum desiccator (JEOL EMDSC-U10A) to remove air bubbles for 15 minutes at a vacuum pressure of approximately 8 torr prior to centrifugation.

The two MCT sample tubes were placed in an Eppendorf micro-centrifuge (Model No. 2412D) set at 9,000 RPM for a total of 90 minutes at room temperature. After removal of the MCT tubes from the centrifuge, the tubes were flash frozen in liquid nitrogen, and the MCT tips were immediately removed with a pre-cleaned 6-inch steel cleaver into clean 42 ml flat bottom disposable centrifuge tubes.

Deionized water was added to the centrifuge tubes to bring the volume to approximately 42 ml. The 42 ml centrifuge tubes were capped and inverted by hand 2 times to distribute the collected material in the bottom of the MCT tips. The 42 ml mixtures were then immediately and continuously filtered through a 47 mm Polycarbonate filters (PC) with a 0.22µm pore size. After the mixtures were filtered, the excess heavy liquids were washed through the filters with the addition of approximately 100 ml of deionized water. The prepared PC filters were placed in new disposable plastic 47mm petri dishes and allowed to dry at ambient room temperature in a HEPA hood for a minimum of 2 hours. The processed PC filter samples were directly prepped onto 100 µm TEM size grids (2 for analysis and 1 for archive) using the standard TEM filter preparation protocol for PC filters.<sup>6,7, 8, 9, 10, 11</sup>

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<sup>6</sup> ISO 22262-2: 2014E Air Quality-Bulk Materials Part 2: Quantitative Determination of Asbestos by Gravimetric and Microscopical Methods.

<sup>7</sup> D2722-09 "Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Structure Loading.

<sup>8</sup> D2726-02 "Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust Loading by Transmission Electron Microscopy for Asbestos Mass Surface.

<sup>9</sup> ISO 10312 1992-02-01, "Ambient Air Determination of Asbestos Fibers-Direct-Transfer Transmission Electron Microscopy Method.

<sup>10</sup> ISO 13794 1999 07-12, "Ambient Air-Determination of Asbestos Fibers-Indirect-Transfer Transmission Electron Microscopy Method.

<sup>11</sup> U.S. Environmental Protection Agency (USEPA) 1987. Asbestos Hazard Emergency Response Act, 40 CFR Part 763, Appendix A to Subpart E, USEPA, Washington D.C.

**ATEM Amphibole Asbestos Analysis: ISO 22262-1 & 2**

For the ATEM analysis, 100 grid openings were analyzed between two grids (20 openings per grid). JEOL 1200EX ATEMs equipped with either a Noran or an Advanced Analysis Technologies (light element) energy dispersive x-ray analyzer (EDXA) were employed for this analysis.

The sample was analyzed at a screen magnification of 20,000X. Verification of regulated asbestos structures is done in the ATEM by the following three steps:

**Morphology (Step 1)**

For the determination of the fibrous morphology (step 1) for any potential regulated amphibole asbestos structures in the sample was done by the standard ATEM methodology.<sup>1,3</sup> For morphology, fibers and bundles, the potential asbestos structures must have substantially parallel sides with an aspect ratio of 2:1 or greater, and at least 0.2 µm in length.

**Regulated Amphibole Asbestos Verification (Steps 2 & 3)**

For potential fibrous asbestos structures that fit the above morphology criteria, they are analyzed in the ATEM by EDXA for the fiber/bundle chemistry (step 2) and selected area electron diffraction (SAED) for the appropriate crystalline lattice measurements for regulated amphibole asbestos.<sup>1,3</sup> The detection limit for this method, as specified by the ISO 22262-1, is the findings of either 1 fiber or 1 bundle in the analysis.

**Process Laboratory Blanks**

For the one set of JBP talcum powder samples that were prepared by the heavy liquid method, one process laboratory blank (sample M70848-000) was run concurrently at time of preparation. The process blank PC filter was prepared in the same exact same manner as the talc samples (with and with-out heavy liquid, filtration on PC filters, etc.) but without any talc material. For the ATEM analysis, 100 grid openings were analyzed for each blank.

## RESULTS

### **MAS ISO-22262-1 PLM Method for Amphibole Asbestos**

The ISO 22262-1 PLM analysis showed that out of the two JBP containers samples analyzed by MAS, none had detectable amounts of regulated amphibole asbestos in the two JBP samples. Also, neither sample contained amphibole asbestos mineral cleavage fragments, but both samples did showed abundant amounts of fibrous talc.

### **PLM/Blount Method for Amphibole Asbestos**

The Blount/PLM method showed that out of the two containers analyzed by MAS, none had detectable amounts amphibole asbestos in the two JBP samples. Also, neither sample contained amphibole asbestos mineral cleavage fragments, but both samples had an estimated moderate concentration of fibrous talc.

### **Fibrous Talc**

As stated above, both the ISO-PLM & Blount/PLM analysis showed that the two JBP samples contained fibrous talc that was described as abundant to moderate concentration.

The fibrous talc component, for each of the ISO & Blount JBP samples, was verified using 1.55 RI fluid with dispersion staining. This analysis was only a survey, time of analysis was between 20 to 30 minutes. It was not designed to detect trace levels of chrysotile for both size of the chrysotile structure or length of time that would be required for a full analysis.

### **Colorado School of Mines PLM Method HLS for the Detection of Chrysotile**

For the PLM-CSM method, both of the Zimmerman JBP containers were found to be positive for chrysotile asbestos. The estimated chrysotile weight percent for JBP container M70484-001 was 0.01 to 0.10 wt.% and for M70484-002 was 0.001 to 0.01 wt.%

Additionally, fibrous talc was detected in each of the two samples (moderate) by the CSM-PLM methods.

### **ATEM ISO 22262-2 Amphibole Asbestos Method**

The ISO 22262-2 ATEM heavy liquid separation method showed that the two JBP containers were non-detects for amphibole asbestos fibers and bundles. If amphibole asbestos was present, it was below our detection limit of <5700 f-b/gram of talcum powder.

## Process Blanks

The one process blank, there was no asbestos structures, cleavage fragments or fibrous or platy talc was detected.

A summary of the overall MAS analysis results are shown in Tables 1.

**Table 1. Asbestos Analysis Results**

Sample Number	Client Sample Number	Year of Manufacture	ATEM Amphibole Asbestos F-B /gram	ATEM Chrysotile Asbestos F-B/gram	ISO PLM w/o HLS amphibole % VAE	PLM/Blount CSM w/ HLS chrysotile % VAE	Fibrous Talc ISO & BL PLM
M70484-001	SGP 447779	1994	<5700	In-progress	NDA*	0.01 to 0.10	Moderate to Abundant
M70484-002	SGP 445997	2014	<5700	In-progress	NDA	0.001 to 0.01	Moderate to Abundant

\*NDA: No Fibrous Amphibole Asbestos Structures Detected

## DISCUSSION/CONCLUSION

### ISO-PLM 22262-1 & Blount/PLM Methods

For the ISO & Blount/PLM analysis performed by MAS on the two JBP talcum powder samples found that both samples were non-detects. Also, neither sample detected asbestos mineral cleavage fragments but did detect fibrous talc at an estimated concentration range of between moderate to abundant.

### Colorado School of Mines HLS for the Detection of Chrysotile

Using the CSM HLS method for both the Zimmerman JBP samples demonstrated that the use of HLS at a density of 2.72 g/cc can concentrate the chrysotile if present at a detection limit of 0.0001 wt. % or above by PLM. This analysis is based, for the most part, on the work done by CSM in the early 1970's that was provide to J&J in two reports that was dated February & April of 1973.

These two JBP positive chrysotile findings is the first time that MAS has detected chrysotile asbestos in J&J's cosmetic talc products. For these two JBP samples, the 1994 container (Vermont) had a chrysotile concentration range of between 0.01 to 0.1 wt. percent. The 2014 JBP container had a chrysotile asbestos concentrated range of between 0.001 to 0.01 wt. percent.

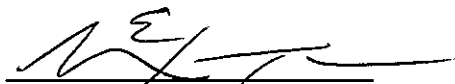
Our positive chrysotile PLM findings, for the 1994 JBP Vermont talc source, is consistent with CSM's PLM analysis of Vermont talc in the early 1970's, as shown in the two CSM documents reference 1 & 2 to this report. Also, the this result is consistent with J&J's early attempt to remove both chrysotile and tremolite during the flotation process for their Vermont talc source as well as a number of McCrone TEM analysis were chrysotile was detected, but blamed their positive chrysotile results on "background contamination" in their laboratory.

Also, MAS's positive chrysotile PLM results for the Zimmerman 2014 JBP container, a Chinese source talc product, is consistent with the results of recent JBP testing by AMA Analytical, the RJ Lee Group, and probably Bureau Veritas of talc samples from the same source mine.

There is no indication or documents that demonstrates that J&J ever shared the CSM heavy liquid separation methods for either chrysotile or amphibole asbestos to the FDA or CSM's positive results for either chrysotile or amphibole asbestos from using their heavy liquid separation methods.

#### **ATEM HLS for Chrysotile Asbestos**

MAS is still working on the method development for detection of chrysotile asbestos by ATEM using the CSM HLS method.



William E. Longo Ph.D.  
CEO MAS LLC



## **Section 2**

**MAS, LLC.**  
**CHAIN-OF-CUSTODY**

CLIENT: Simon Greenstone Panatier Bartlett  
CONTACT: Chris Panatier  
PHONE: (214) 276-7680  
CLIENT JOB NAME: 14-2346 Linda Zimmerman  
CLIENT JOB#: 14-2346  
CLIENT DOC(S): Letter of Transmittal, COC, photos  
FAX NUMBER:

MAS JOB: M70484  
LOGIN DATE: 5/16/2019  
SUBMITTED BY: Yvonne Champagne  
TRANSPORT: FedEx 775227065202  
RECEIVED BY: Shaquanna Lytle  
CONDITION: Good

MAS LOCATION: Rm 123DATE/BY: 5/28/19 JAMPREP BY: JAMDATE: 6/13/19 JAM  
2/13/2020ANALYSIS BY: PHDATE: 6/12/19 to 2/22/20QC BY: PHDATE: 2/24/20REPORT BY: JAMDATE: 2/24/2020REVIEWED BY: JAMDATE: 2/24/2020

FINAL DISPOSITION BY

LOCATION: Legal Talc Storage Rm 123

DATE: \_\_\_\_\_

MAS #	CLIENT ID	VOLUME	TYPE MATERIAL
001	SGP 487779		Johnson & Johnson Baby Powder 15oz

LOCATION: \_\_\_\_\_

MAS #	CLIENT ID	VOLUME	TYPE MATERIAL
2	SGP 445997		Johnson & Johnson Baby Powder 1.5oz

LOCATION: \_\_\_\_\_

SAMPLE(S) RETURNED BY: NA

DATE: \_\_\_\_\_

FEDEX TRACKING # \_\_\_\_\_

RECEIVED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

COMMENT PLM Analyses -JAM  
2/24/2020

MAS, LLC.

3945 Lakefield Court  
Suwanee, Georgia 30024  
(770) 866-3200

1/13/14 Revision 0

M70484

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MAS, LLC.  
CHAIN-OF-CUSTODY

CLIENT: Simon Greenstone Panatier Bartlett  
CONTACT: Chris Panatier  
PHONE: (214) 276-7680  
CLIENT JOB NAME: 14-2346 Linda Zimmerman  
CLIENT JOB#: 14-2346  
CLIENT DOC(S): Letter of Transmittal, COC, photos  
FAX NUMBER:

MAS JOB: M70484  
LOGIN DATE: 5/16/2019  
SUBMITTED BY: Yvonne Champagne  
TRANSPORT: FedEx 775227065202  
RECEIVED BY: Shaquanna Lytle  
CONDITION: Good

MAS LOCATION: Rm 123DATE/BY: 5/28/19 JAMPREP BY JAMDATE: 6/13/19 thmANALYSIS BY: JGCDATE: 7-23-19 thmQC BY: JGCDATE: 7-29-19REPORT BY: HLDATE: 2-24-2020REVIEWED BY: HLDATE: 2-24-2020

FINAL DISPOSITION BY

LOCATION: LEGAL ARCHIVE RM. 123DATE: (2)

MAS #	CLIENT ID	VOLUME	TYPE	MATERIAL
001	SGP 487779			Johnson & Johnson Baby Powder 15oz

LOCATION

2	SGP 445997			Johnson & Johnson Baby Powder 1.5oz
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LOCATION

SAMPLE(S) RETURNED BY: HL

DATE: \_\_\_\_\_

FEDEX TRACKING # \_\_\_\_\_

RECEIVED BY: HL

DATE: \_\_\_\_\_

COMMENT

TEM ANALYSIS

MAS, LLC.

3945 Lakefield Court  
Suwanee, Georgia 30024  
(770) 866-3200

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M70484

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## CHAIN OF CUSTODY

Project No. or Identification: Linda Zimmerman's Johnson's Baby Powder – 15oz

Sample ID	Other ID	Description
SGP 487779	0876RB1	One (1) 15 oz white bottle of Johnson's Baby Powder

Relinquished by (sign): <i>Linda Zimmerman</i>	Received by (sign):
Delivery Method: Hand delivered	Delivery Method: Hand delivered
Date: 1/11/19 Printed name: Linda Zimmerman	Date: 1/11/19 Printed name: Conor Nideffer
Company:	Company:

Relinquished by (sign): <i>Conor Nideffer</i>	Received by (sign): <i>C Dutton</i>
Delivery Method: <i>Fed Ex</i>	Delivery Method: <i>Fed Ex</i>
Date: 5-6-19 Printed name: Conor Nideffer	Date: 5-7-19 Printed name: Christi Dutton
Company: <i>SGP</i>	Company: <i>Simon Greenstone</i>

Relinquished by (sign): <i>Yvonne Champagne</i>	Received by (sign): <i>S. Lytle</i>
Delivery Method: <i>Fed-Ex</i>	Delivery Method: <i>Fed Ex</i>
Date: 5/15/19 Printed name: Yvonne Champagne	Date: 05-16-19 Printed name: ShaQuanna Lytle
Company: <i>Simon Greenstone</i>	Company: <i>MAS</i>

Relinquished by (sign):	Received by (sign):
Delivery Method:	Delivery Method:
Date: Printed name:	Date: Printed name:
Company:	Company:

<b>Relinquished by (sign):</b>	<b>Received by (sign):</b>
<b>Delivery Method:</b>	<b>Delivery Method:</b>
<b>Date:</b> <b>Printed name:</b>	<b>Date:</b> <b>Printed name:</b>
<b>Company:</b>	<b>Company:</b>

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<b>Date:</b> <b>Printed name:</b>	<b>Date:</b> <b>Printed name:</b>
<b>Company:</b>	<b>Company:</b>

## CHAIN OF CUSTODY

Project No. or Identification: Linda Zimmerman's Johnson's Baby Powder – 1.5oz

Sample ID	Other ID	Description
SGP 445997	1045RA	One (1) 1.5 oz white bottle of Johnson's Baby Powder

Relinquished by (sign): <i>Linda Zimmerman</i>	Received by (sign):
Delivery Method: Hand delivered	Delivery Method: Hand delivered
Date: 1/11/19 Printed name: Linda Zimmerman	Date: 1/11/19 Printed name: Conor Nideffer
Company:	Company:

Relinquished by (sign): <i>Conor Nideffer</i>	Received by (sign): <i>Christi Dutton</i>
Delivery Method: <i>FedEx</i>	Delivery Method: <i>FedEx</i>
Date: 5-6-19 Printed name: Conor Nideffer	Date: 5-7-19 Printed name: Christi Dutton
Company: <i>SGP</i>	Company: <i>Simon Greenstone</i>

Relinquished by (sign): <i>Vivienne Champagne</i>	Received by (sign): <i>S Lytle</i>
Delivery Method: <i>FedEx</i>	Delivery Method: <i>FedEx</i>
Date: 5/15/19 Printed name: Vivienne Champagne	Date: 05-16-19 Printed name: Shaquanna Lytle
Company: <i>Simon Greenstone</i>	Company: <i>MAS</i>

Relinquished by (sign):	Received by (sign):
Delivery Method:	Delivery Method:
Date: Printed name:	Date: Printed name:
Company:	Company:



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<b>Relinquished by (sign):</b>	<b>Received by (sign):</b>
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<b>Company:</b>	<b>Company:</b>

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<b>Delivery Method:</b>	<b>Delivery Method:</b>
<b>Date:</b> <b>Printed name:</b>	<b>Date:</b> <b>Printed name:</b>
<b>Company:</b>	<b>Company:</b>

JEFFREY B. SIMON (CA, NY, TX)  
DAVID C. GREENSTONE (CA, NY, TX)  
CHRISTOPHER J. PANATIER (CA, PA, TX)  
STUART J. PURDY (CA)  
JAY E. STUEMKE (TX)  
LISA M. BARLEY (CA)  
LEAH C. KAGAN (CA, NJ, NY)  
DARREN P. McDOWELL (TX)

ASSOCIATES  
JORDAN BLUMENFELD-JAMES (CA)  
DEBBIE BRYANT (TX)  
HEATHER V. DAVIS (TX)  
TYSON B. GAMBLE (CA, OR, WA)  
JACEY L. HORNECKER (TX)

# SIMON GREENSTONE PANATIER

TRIAL LAWYERS

ATTORNEYS & COUNSELORS AT LAW  
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JODEE NEIL (TX)  
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STEVEN S. SCHULTE (TX)  
DANA C. SIMON (TX)  
CHARLES E. SOECHTING, JR. (PA, TX)  
IYMAN STRAWDER (TX, CA)  
ORLANDO VERA, JR. (TX)  
FRANK J. WATHEN (TX)

PLEASE RESPOND TO THE TEXAS OFFICE

05/15/19

VIA FED-EX: 7752 2706 5202

Dr. William Longo  
Material Analytical Services  
3945 Lakefield Court  
Suwanee, GA 30024  
(770) 866-3208

Re: Analysis for Presence of Asbestos Fibers in Talc Product  
SGP 487779  
SGP 445997

Dear Dr. Longo,

Enclosed please find the following cosmetic talc sample(s) for analysis:

**SGP 487779; Johnson's Baby Powder, 15oz**  
**SGP 445997; Johnson's Baby Powder, 1.5oz**

Below are photographs of the product(s) upon original receipt.

Enclosed please also find labels containing an SGP sample number for each product. We have handwritten the SGP sample number on each zip lock bag. Please match up the bag to its respective label and we ask that you affix it to the correct product. This sample number helps with our internal records and tracking of the product.

Please reference our sample number(s) in any report you may generate in this matter, in addition to your own MAS identification number(s).

*See following page for photographs...*



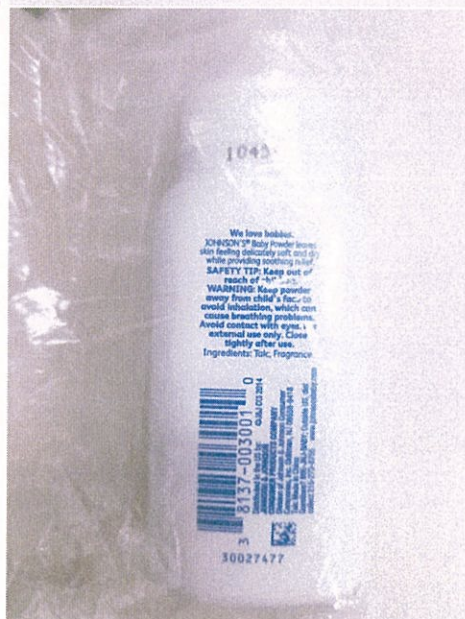
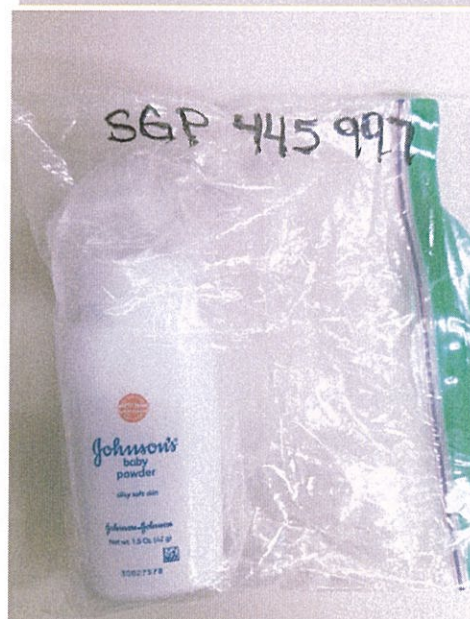
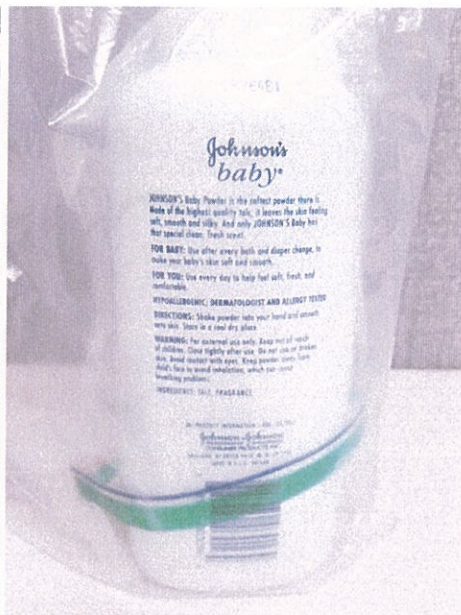
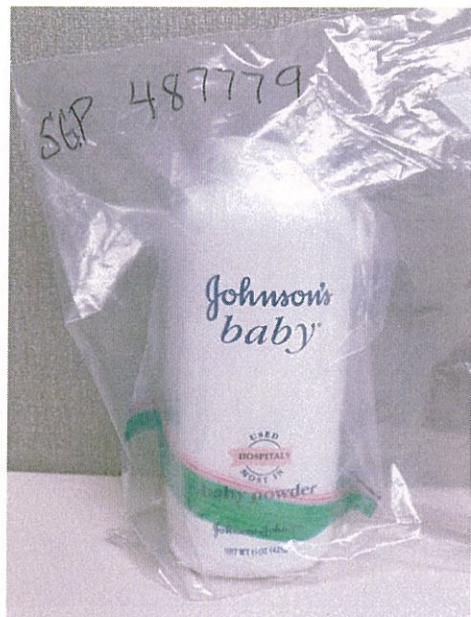
Shipping Package Inspected By:  
1. SL Date 5-16-19  
2. SL Date 05-16-2019

LONG BEACH:  
3780 Kilroy Airport Way, Suite 540  
Long Beach, California 90806  
562-590-3400 (T)  
562-590-3412 (F)

DALLAS (Primary Office):  
1201 Elm St., Suite 3400  
Dallas, Texas 75270  
214-276-7680 (T)  
214-276-7699 (F)

NEW YORK:  
5 Penn Plaza, Suite 2308  
New York, New York 10001  
212-634-1690 (T)  
214-276-7699 (F)





These are opened products that have been used by our client Linda Zimmerman.

Once you have concluded testing of this product(s), please return it and all paperwork (pictures, chain of custody, etc.) to my attention in our Dallas office. If you have any questions or concerns, please do not hesitate to contact me at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Yvonne Champagne". The script is cursive and fluid, with the first letter 'Y' being particularly large and stylized.

*Yvonne Champagne*  
*Administrative Assistant*

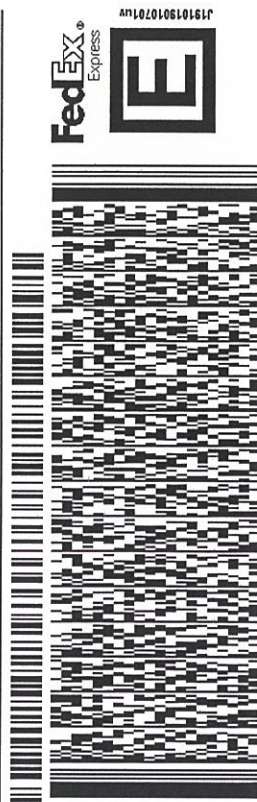
Enclosures

ORIGIN ID:KIPA (214) 276-7680  
YVONNE CHAMPAGNE  
SHIP DATE: 15MAY19  
ACTWGT: 1.00 LB  
CAD: 3872287/INET4100  
BILL SENDER  
1201 ELM ST.  
STE. 3400  
DALLAS, TX 75270  
UNITED STATES US

TO DR. WILLIAM LONGO  
MATERIAL ANALYTICAL SERVICES  
3945 LAKEFIELD COURT

SUWANEE GA 30024  
(770) 866-2208  
REF. ZIMMERMAN LINDA 01-CA  
INV. PO. DEPT.

565J1/D66C/23AD



THU - 16 MAY 3:00P  
STANDARD OVERNIGHT

TRK# 7752 2706 5202

NG AYSA  
GA-US  
30024  
ATL



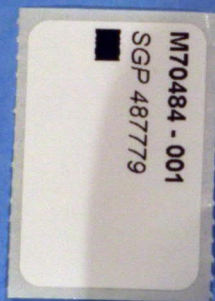
After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

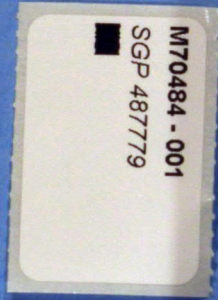
Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.  
Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

## **Section 3**

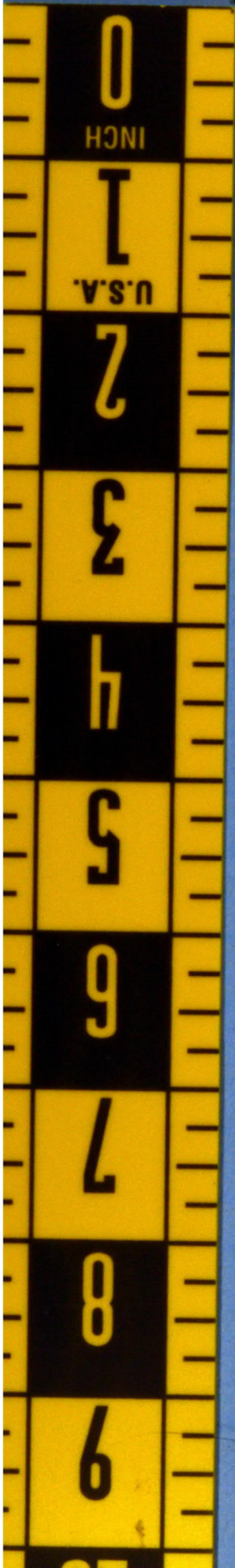
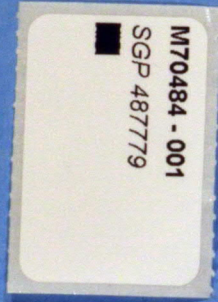




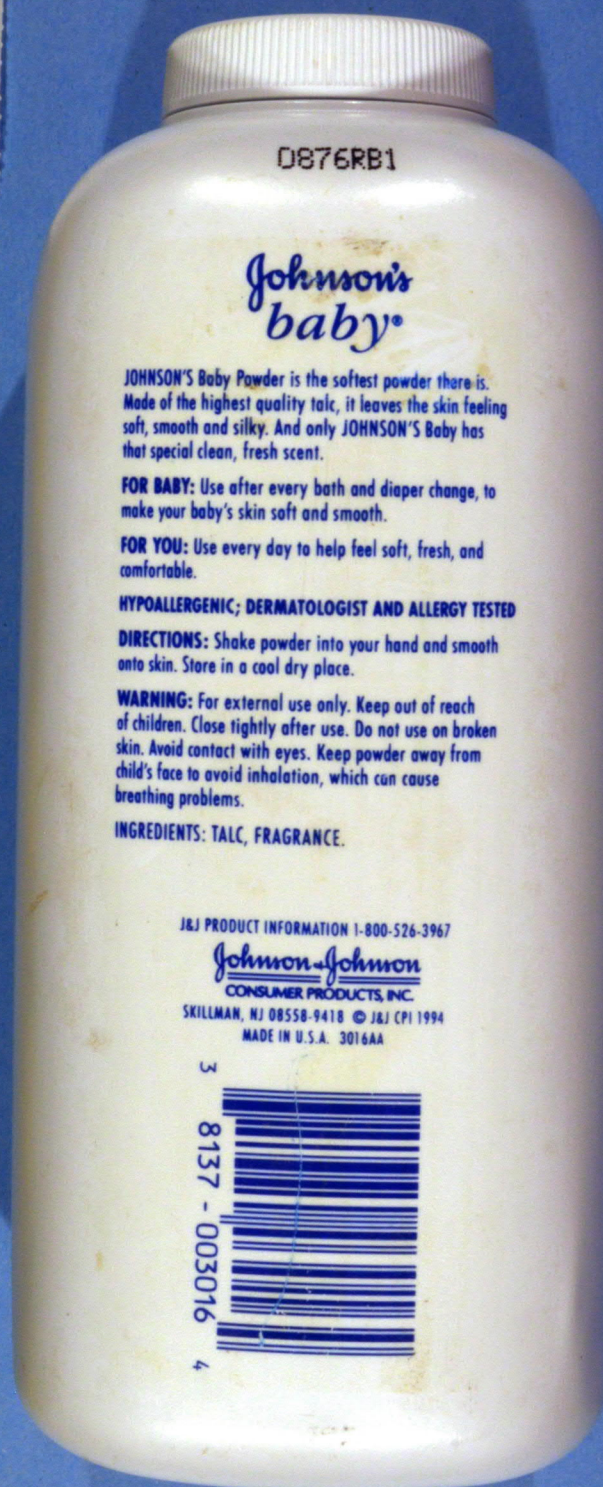
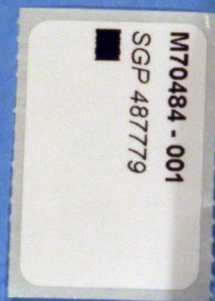
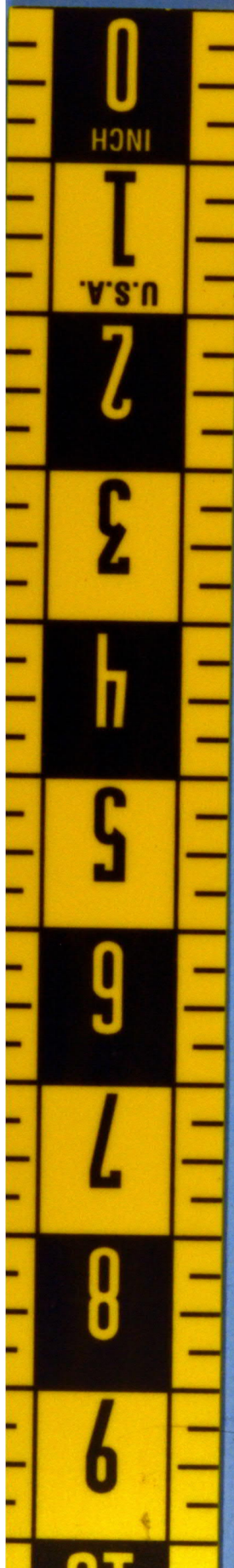




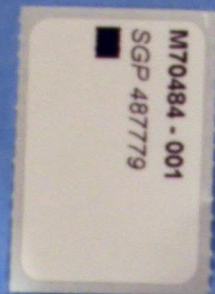




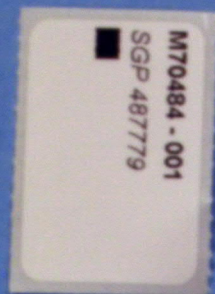












**MAS, LLC  
PLM ANALYSIS**

**Proj#-Spl#** M70484 - 001ISO **Analyst** Paul Hess **Date** 6/17/2019  
**ClientName** Simon Greenstone Panatier Bartlett **ClientSpl** SGP 487779  
**Location** \_\_\_\_\_  
**Type\_Mat** Johnson & Johnson Baby Powder 15oz  
**Gross** Off-white powder **% of Sample** 100  
**Visual** \_\_\_\_\_  
\_\_\_\_\_

**OPTICAL DATA FOR ASBESTOS IDENTIFICATION**

<b>Morphology</b>			
<b>Pleochroism</b>			
<b>Refract Index</b>			
<b>Sign^</b>			
<b>Extinction</b>			
<b>Birefringence</b>			
<b>Melt</b>			
<b>Fiber Name</b>			

**ASBESTOS MINERALS**

**EST. VOL. %**

NO ASBESTOS OBSERVED

**Chrysotile**.....  
**Amosite**.....  
**Crocidolite**.....  
**Tremolite/Actinolite**.....  
**Anthophyllite**.....

**OTHER FIBROUS COMPONENTS**

**Talc -B/Y DS in 1.55** \*\*\*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**NON FIBROUS COMPONENTS**

<b>Opagues</b>	X
<b>Talc</b>	X
<b>Mineral grains</b>	X
_____	_____

**Binder Description** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Comments** X = Materials detected. \*\*\* Abundant Fibrous Talc observed.  
\_\_\_\_\_  
\_\_\_\_\_

The method detection limit is 1% unless otherwise stated.



**MAS, LLC  
PLM ANALYSIS**

Proj#-Spl# M70484 - 001BL Analyst Paul Hess Date 6/19/2019  
 ClientName Simon Greenstone Panatier Bartlett ClientSpl SGP 487779  
 Location \_\_\_\_\_  
 Type\_Mat Johnson & Johnson Baby Powder 15oz  
 Gross Off-white debris on slide % of Sample 100  
 Visual \_\_\_\_\_

**OPTICAL DATA FOR ASBESTOS IDENTIFICATION**

Morphology			
Pleochroism			
Refract Index			
Sign^			
Extinction			
Birefringence			
Melt			
Fiber Name			

**ASBESTOS MINERALS**

**EST. VOL. %**

NO ASBESTOS OBSERVED

Chrysotile.....  
 Amosite.....  
 Crocidolite.....  
 Tremolite/Actinolite.....  
 Anthophyllite.....

**OTHER FIBROUS COMPONENTS**

Talc -B/Y DS in 1.55 \*\*\*  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**NON FIBROUS COMPONENTS**

Opagues	X
Talc	X
Mineral grains	X
_____	_____

Binder Description \_\_\_\_\_

Comments X = Materials detected. \*\*\* Modereate amount of Fibrous Talc observed.

The method detection limit is 1% unless otherwise stated.

**MAS, LLC  
PLM ANALYSIS**

**Proj#-Spl#** M70484 - 001HLM **Analyst** Paul Hess **Date** 2/21/2020  
**ClientName** Simon Greenstone Panatier Bartlett **ClientSpl** SGP 487779  
**Location** \_\_\_\_\_  
**Type\_Mat** Johnson & Johnson Baby Powder 15oz  
**Gross** White debris on filter **% of Sample** 100  
**Visual** \_\_\_\_\_

**OPTICAL DATA FOR ASBESTOS IDENTIFICATION**

<b>Morphology</b>	<u>wavy</u>		
<b>Pleochroism</b>	<u>none</u>		
<b>Refract Index</b>	<u>1.570/1.561</u>		
<b>Sign^</b>	<u>positive</u>		
<b>Extinction</b>	<u>parallel</u>		
<b>Birefringence</b>	<u>low</u>		
<b>Melt</b>	<u>no</u>		
<b>Fiber Name</b>	<u>Chrysotile</u>		

**ASBESTOS MINERALS**

**EST. VOL. %**

**Chrysotile**..... 0.01 to 0.10  
**Amosite**..... \_\_\_\_\_  
**Crocidolite**..... \_\_\_\_\_  
**Tremolite/Actinolite**..... \_\_\_\_\_  
**Anthophyllite**..... \_\_\_\_\_

**OTHER FIBROUS COMPONENTS**

**Talc -B/Y DS in 1.55** \*\*\*  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

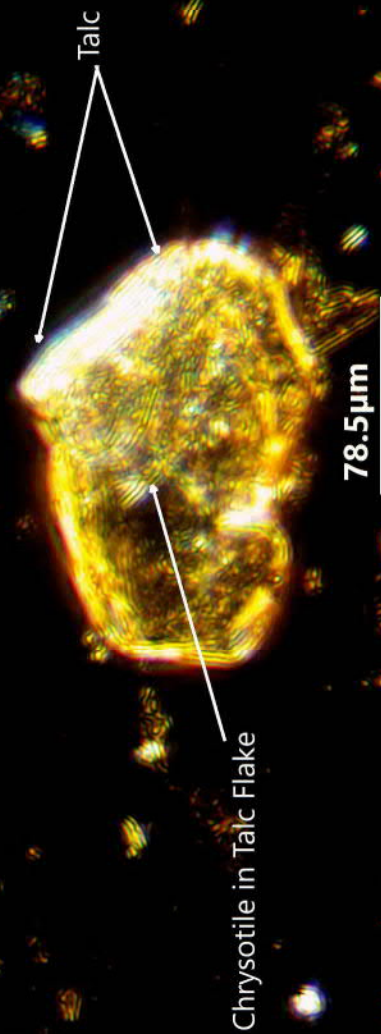
**NON FIBROUS COMPONENTS**

**Opagues** X  
**Talc** X  
**Mineral grains** X  
 \_\_\_\_\_

**Binder Description** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

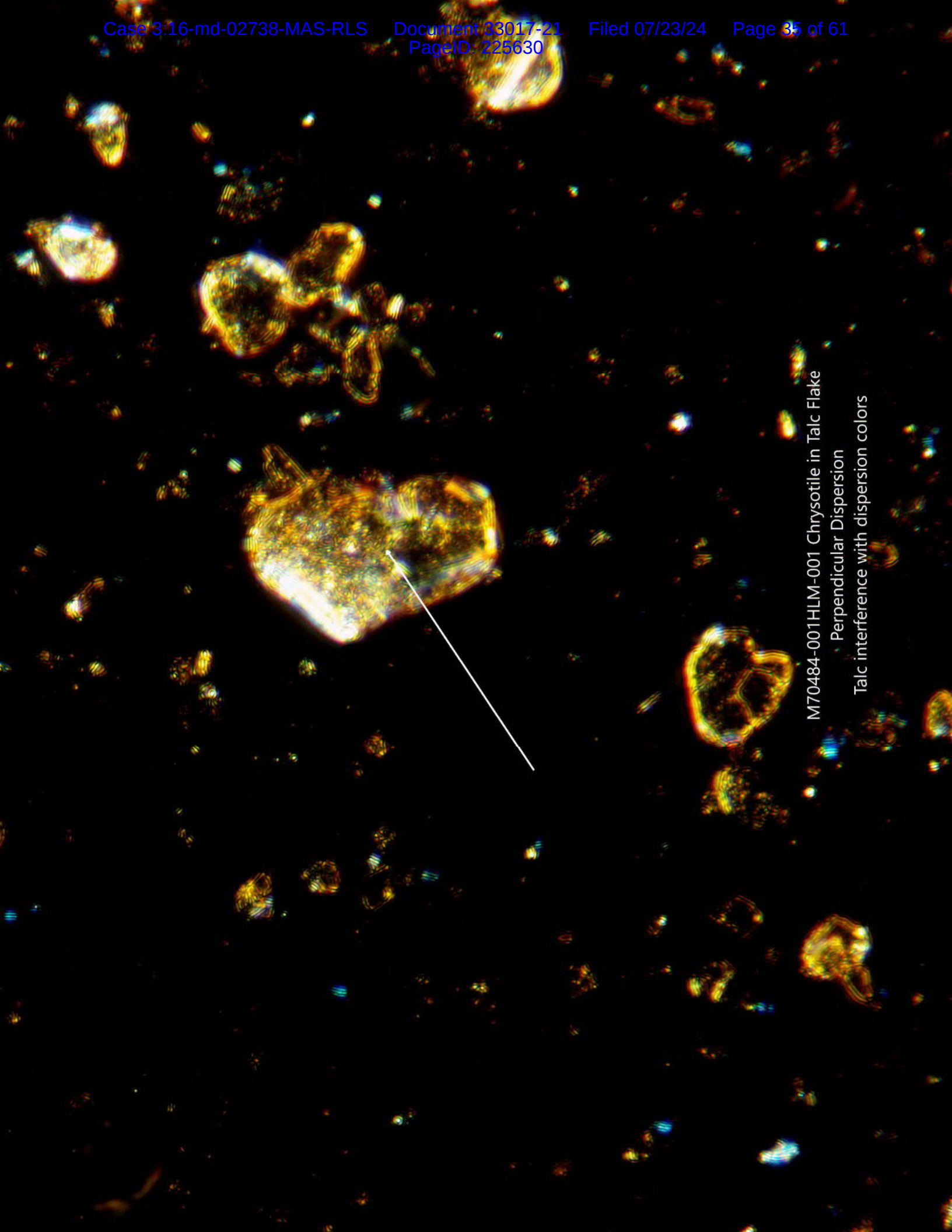
**Comments** Chrysotile asbestos observed. X = Materials detected. \*\*\* Modereate amount of Fibrous Talc observed.  
 \_\_\_\_\_  
 \_\_\_\_\_

The method detection limit is 1% unless otherwise stated.



M70484-001HLM-001 Chrysotile in Talc Flake  
Parallel Dispersion 1.550 R.I. @ 100X  
Talc interference with Dispersion colors

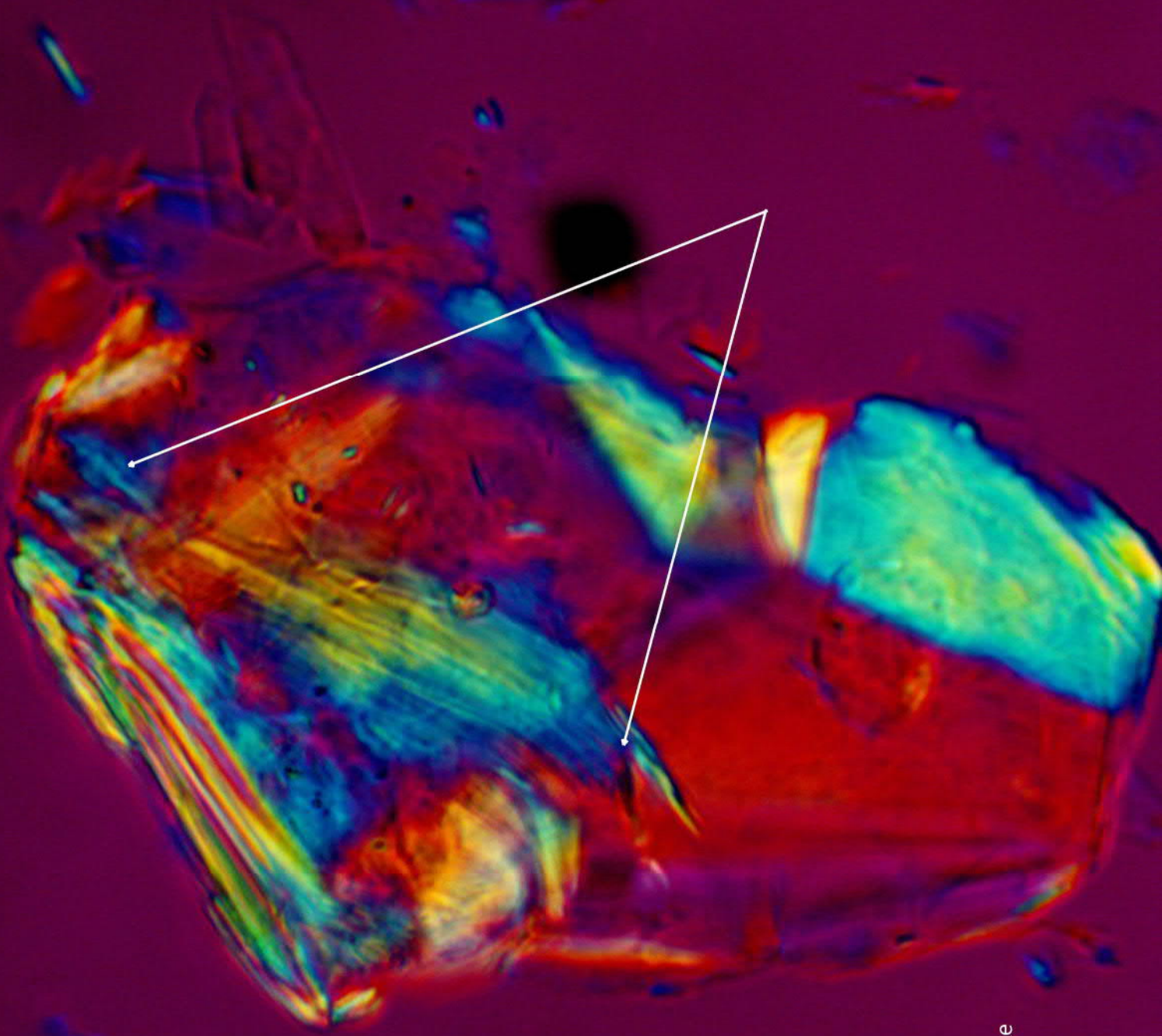




M70484-001HLM-001 Chrysotile in Talc Flake

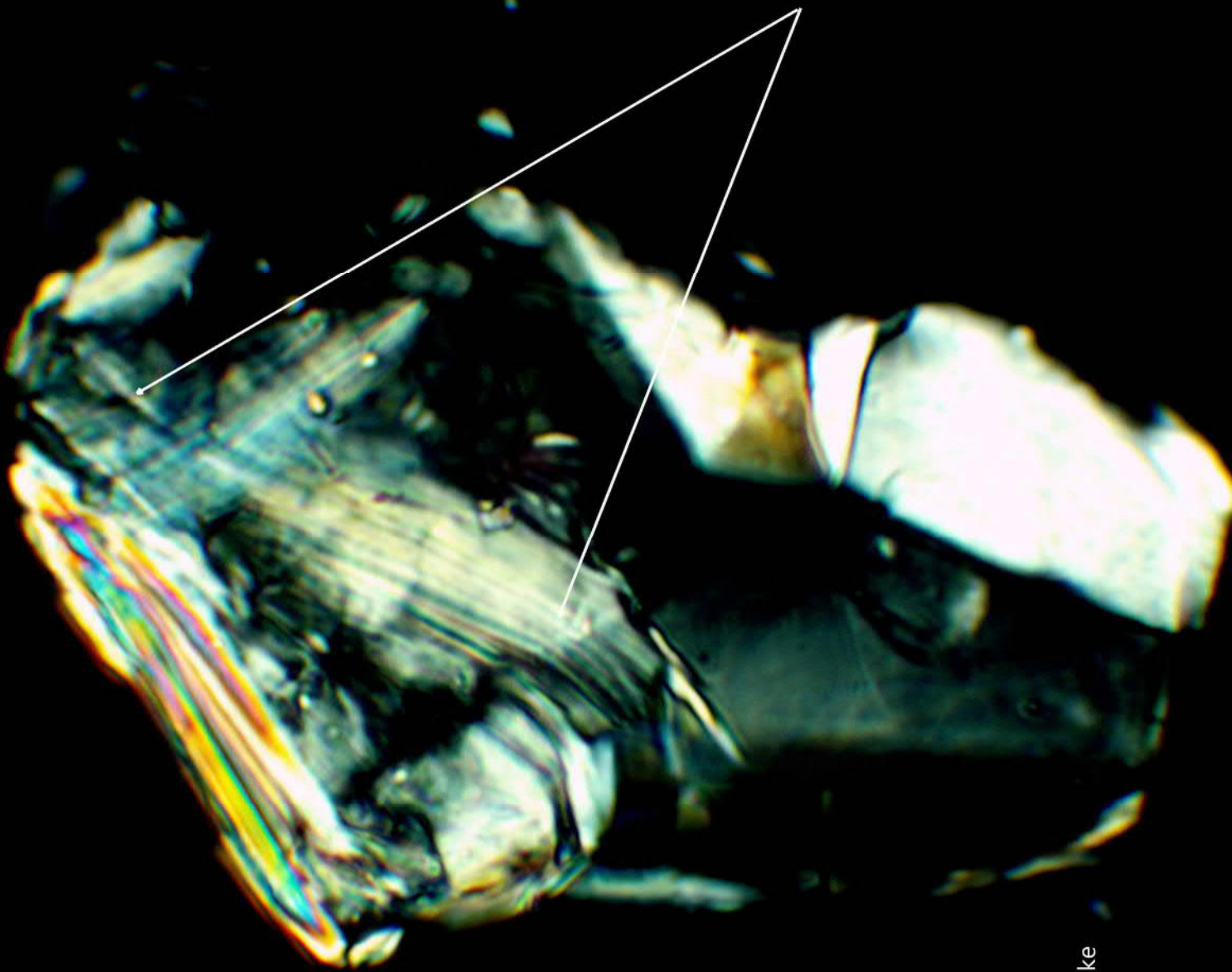
Perpendicular Dispersion

Talc interference with dispersion colors



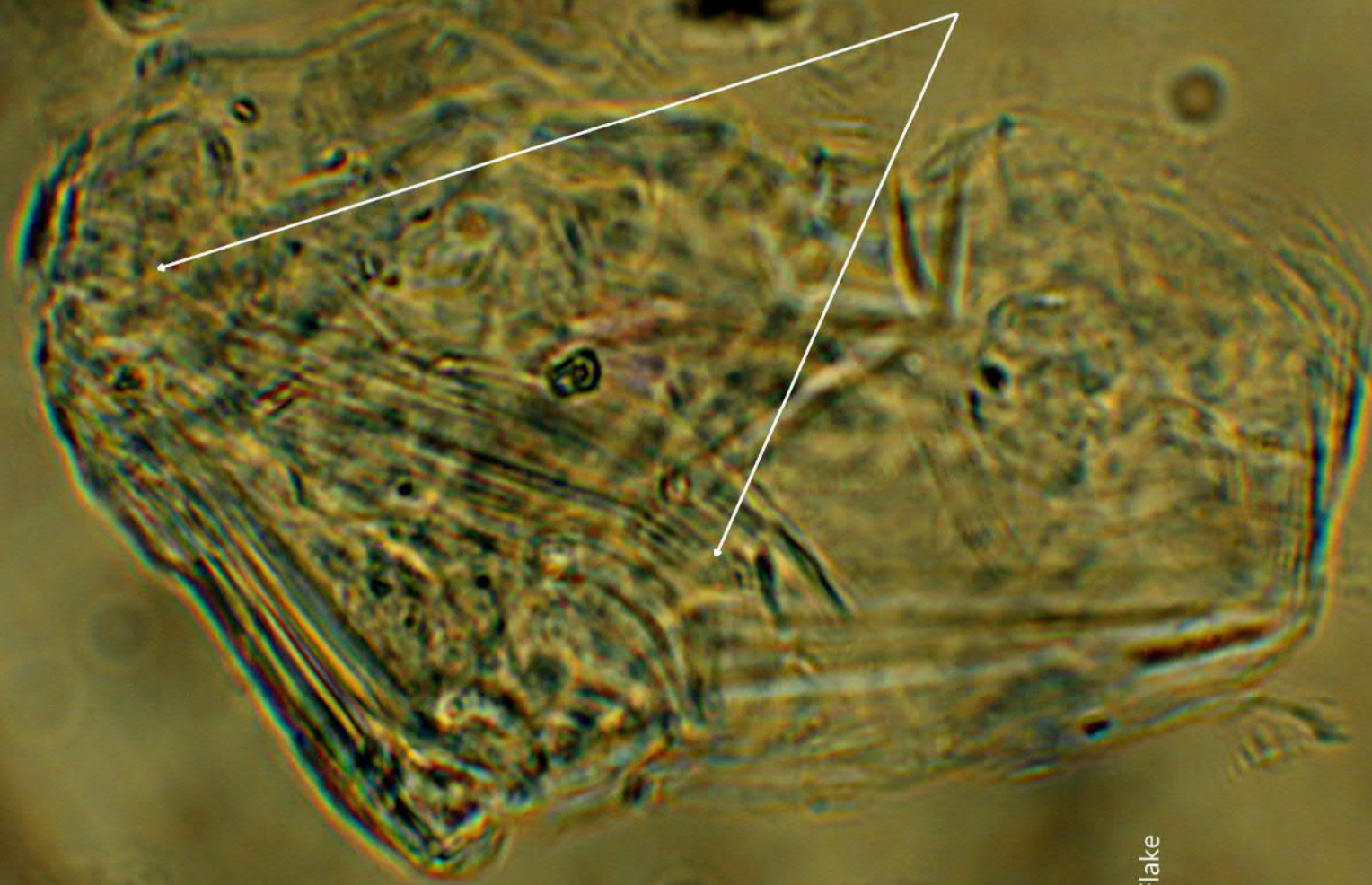
M70484-001HLM-001 Chrysotile in Talc Flake  
Elongation @ 400X





M70484-001HLM-001 Chrysotile in Talc Flake  
Crossed Polars





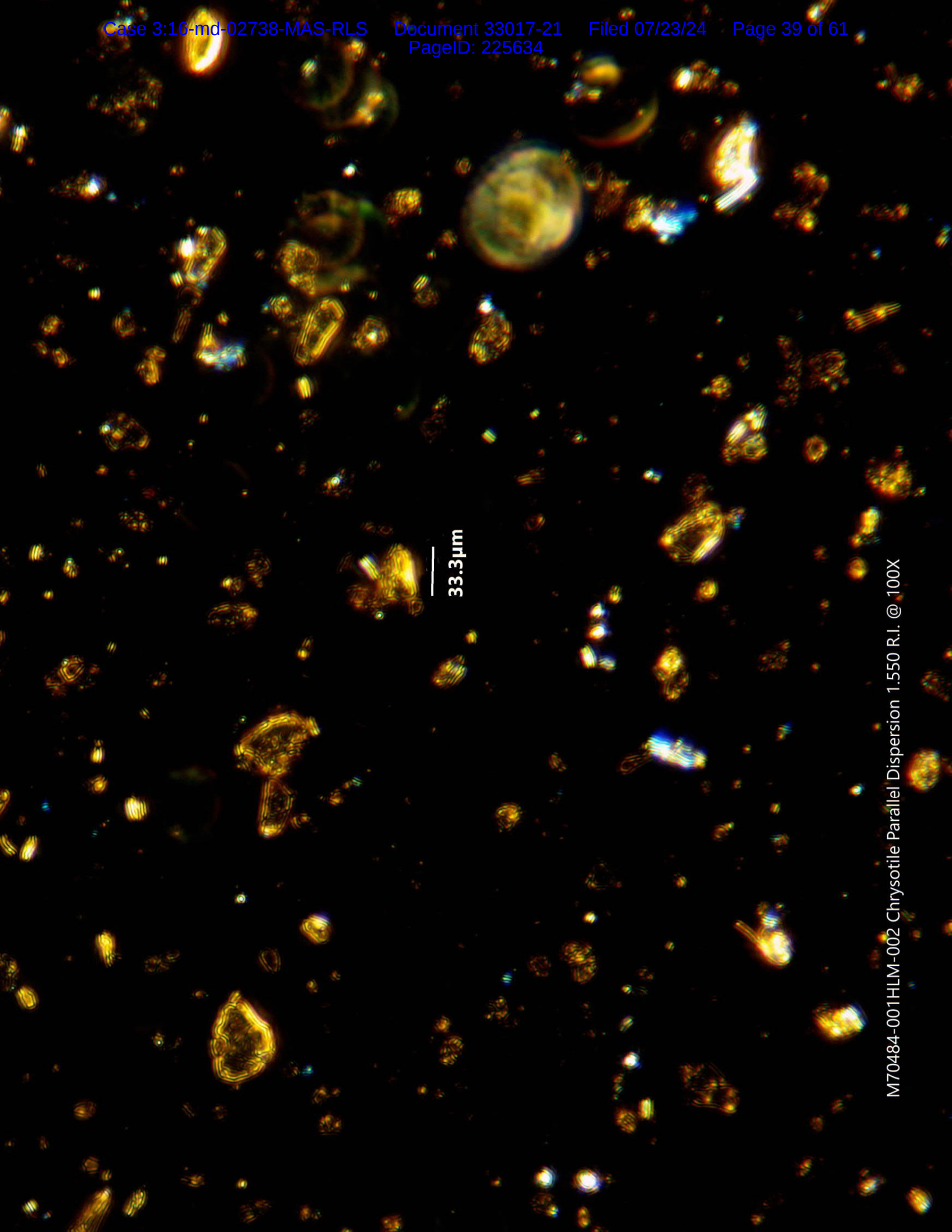
M70484-001HLM-001 Chrysotile in Talc Flake

Polarizer out

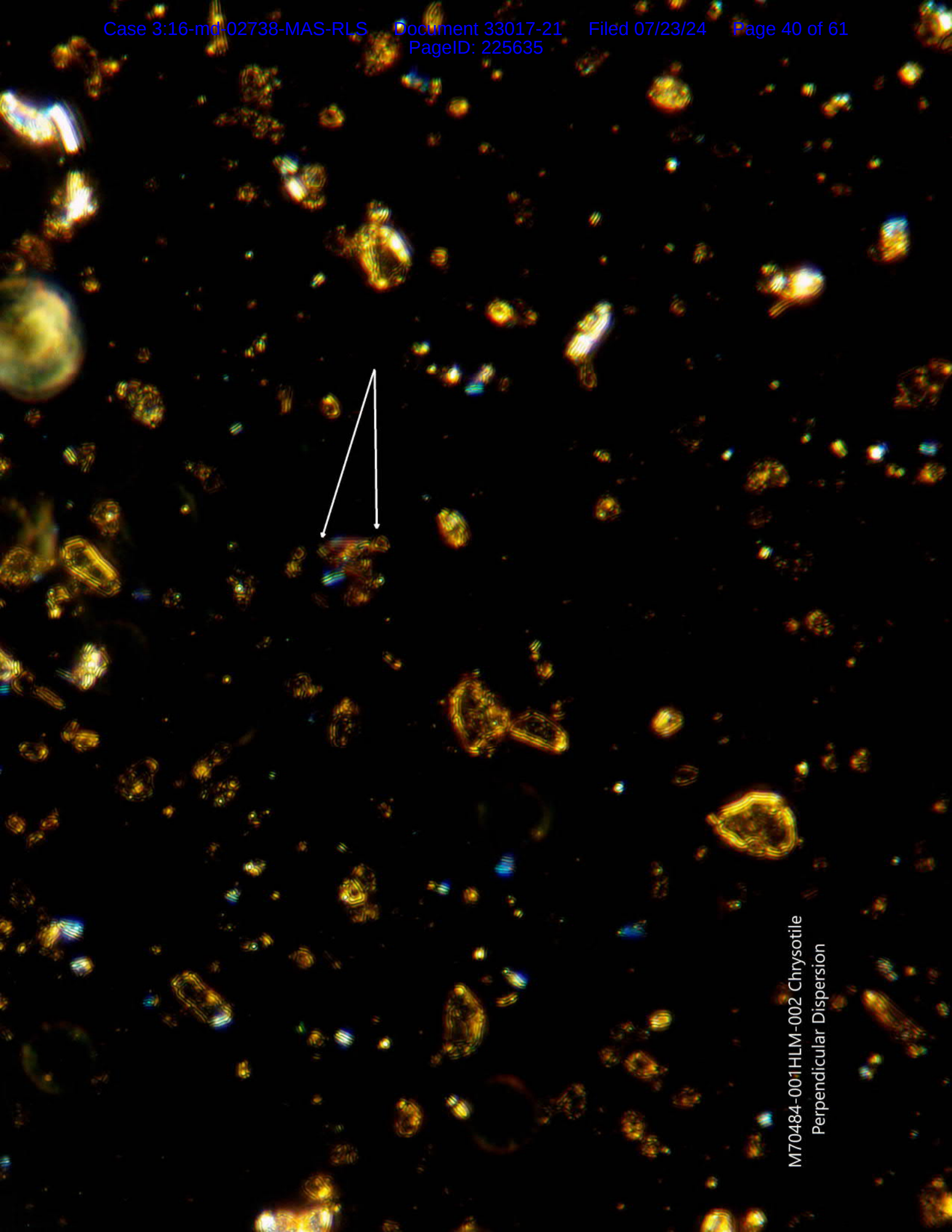
Aperture Diaphragm 95% closed

1.550 R.I. @ 400X

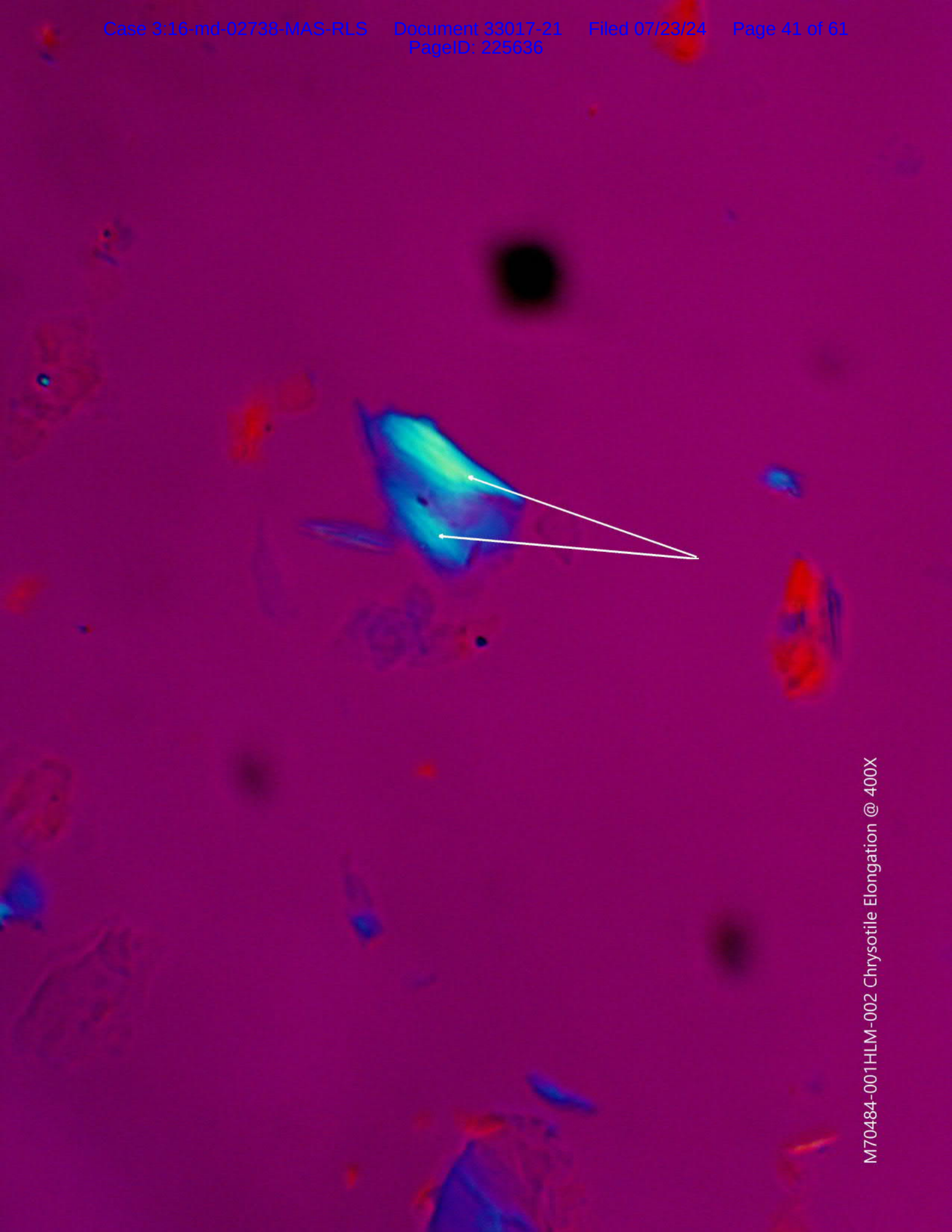




33.3µm

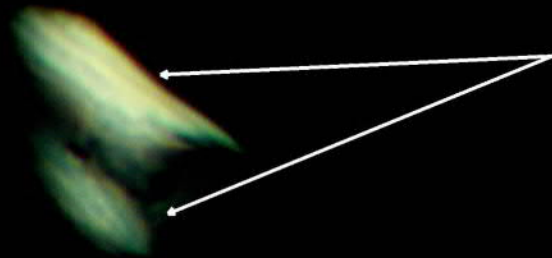


M70484-001HLM-002 Chrysotile  
Perpendicular Dispersion

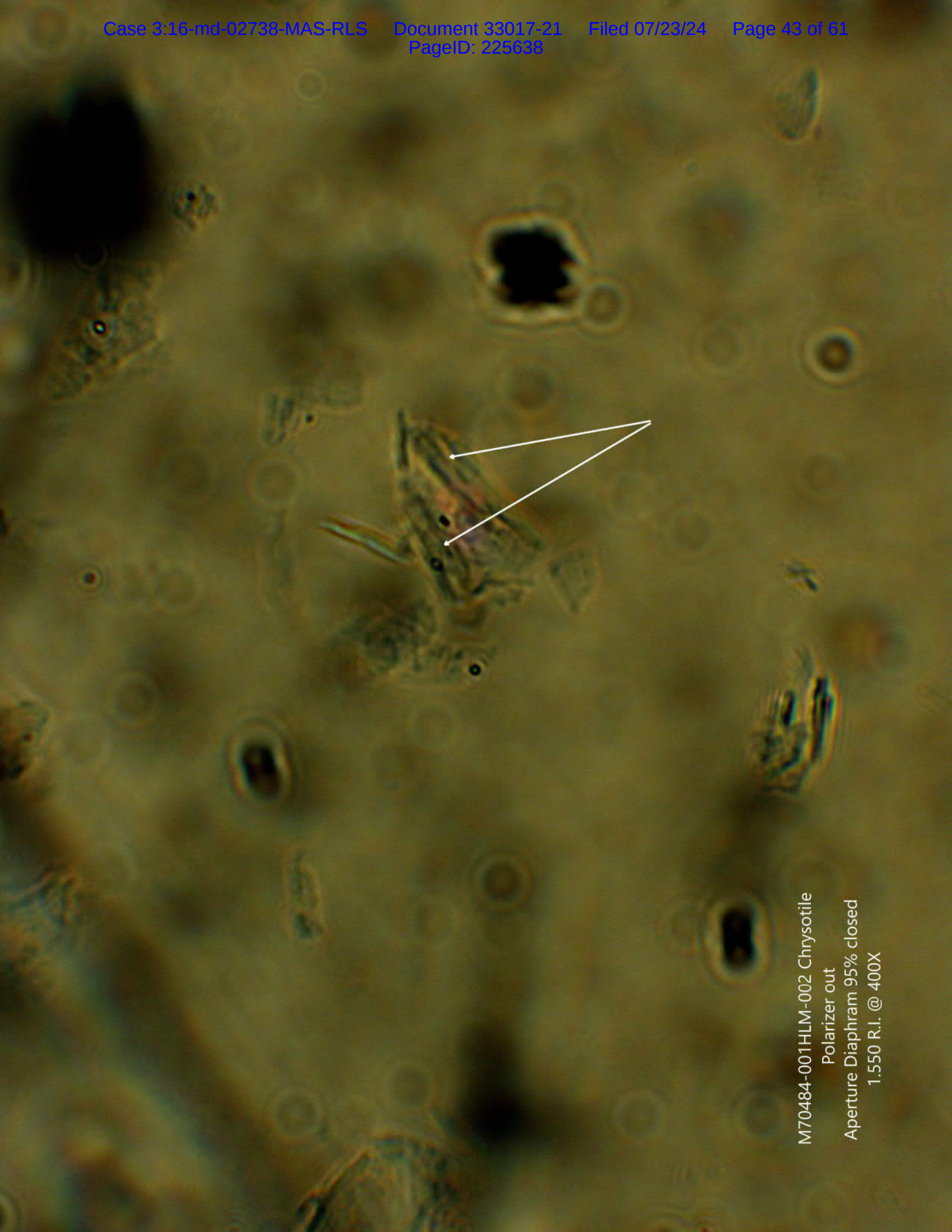


M70484-001HLM-002 Chrysotile Elongation @ 400X





M70484-001HLM-002 Chrysotile Crossed Polars



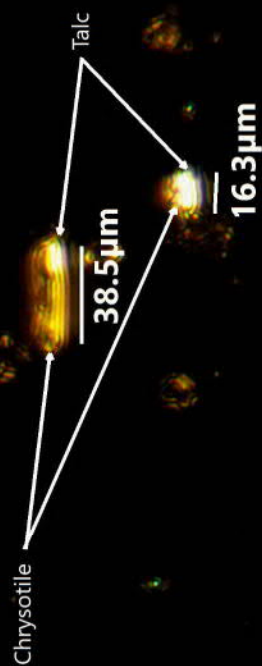
M70484-001HLM-002 Chrysotile

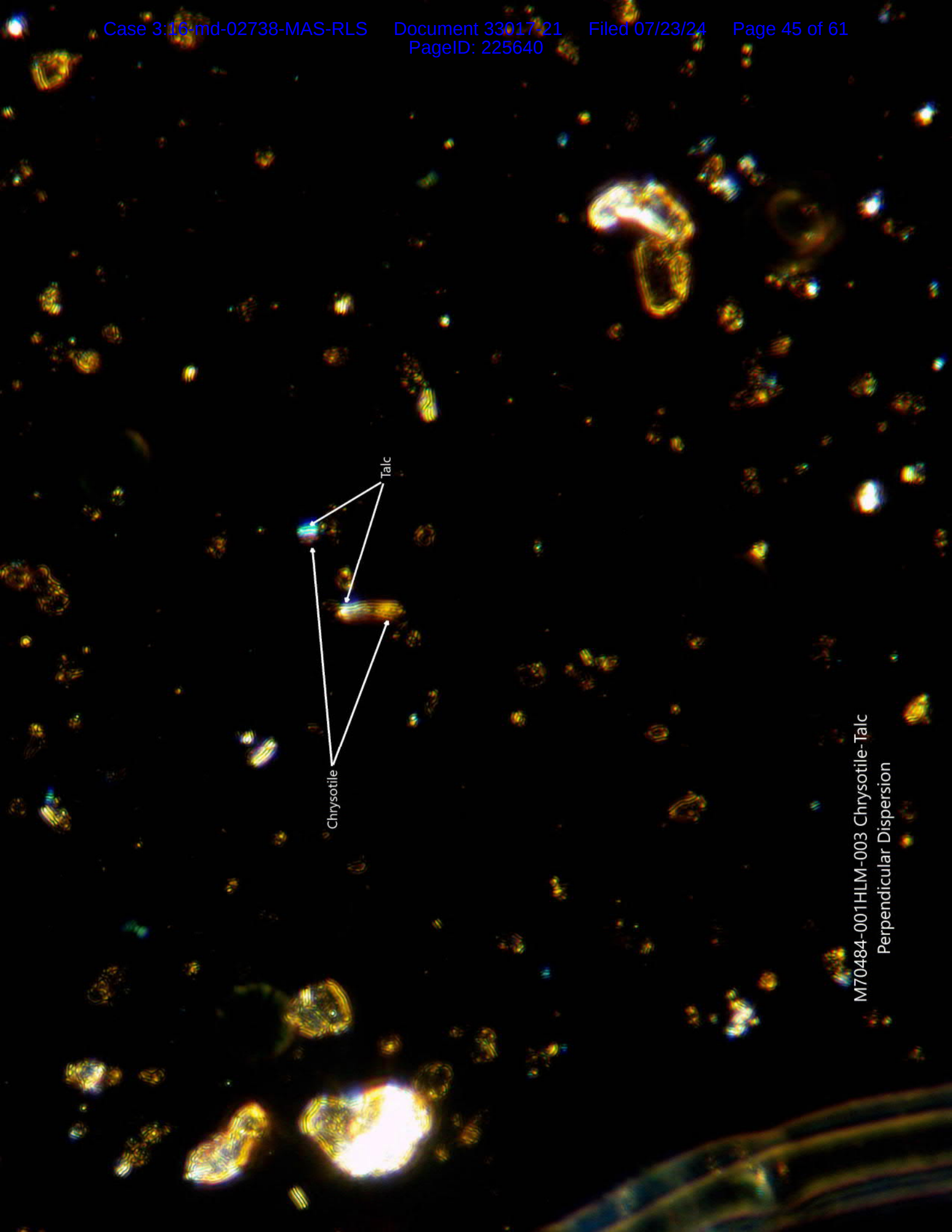
Polarizer out

Aperture Diaphragm 95% closed

1.550 R.I. @ 400X







Talc

Chrysotile

M70484-001HLM-003 Chrysotile-Talc  
Perpendicular Dispersion

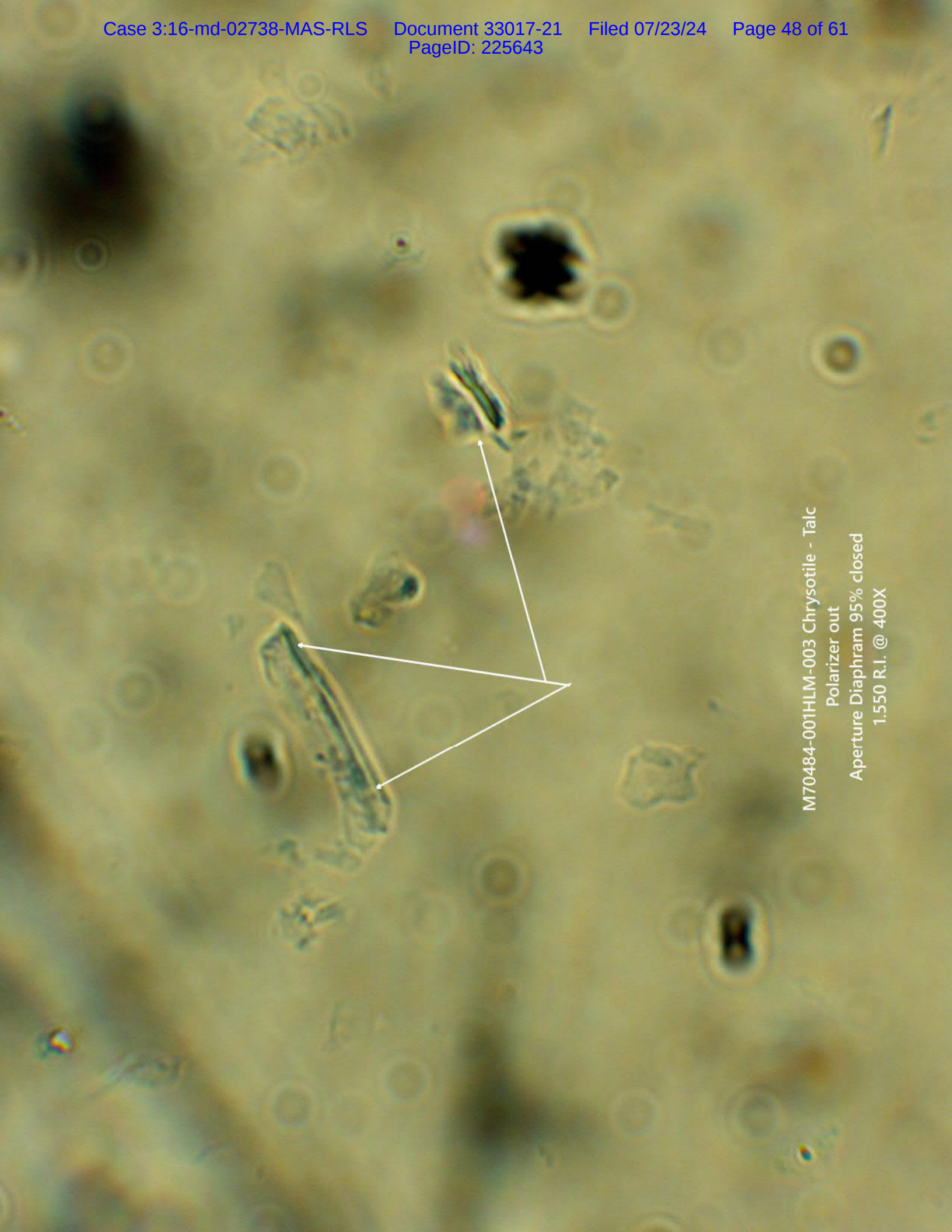
Indications of very fine fibers





M70484-001HLM-003 Chrysotile - Talc Crossed Polars



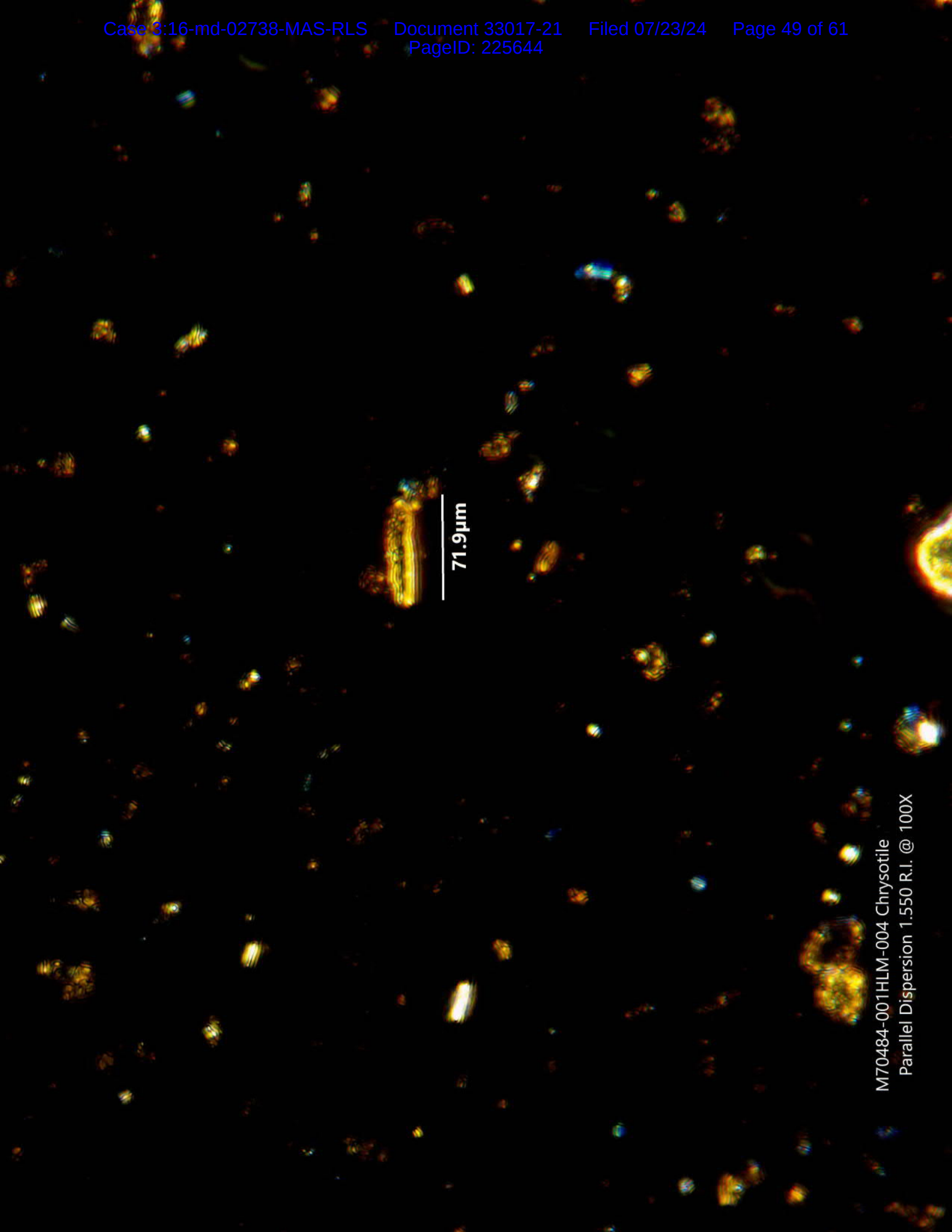


M70484-001HLM-003 Chrysotile - Talc

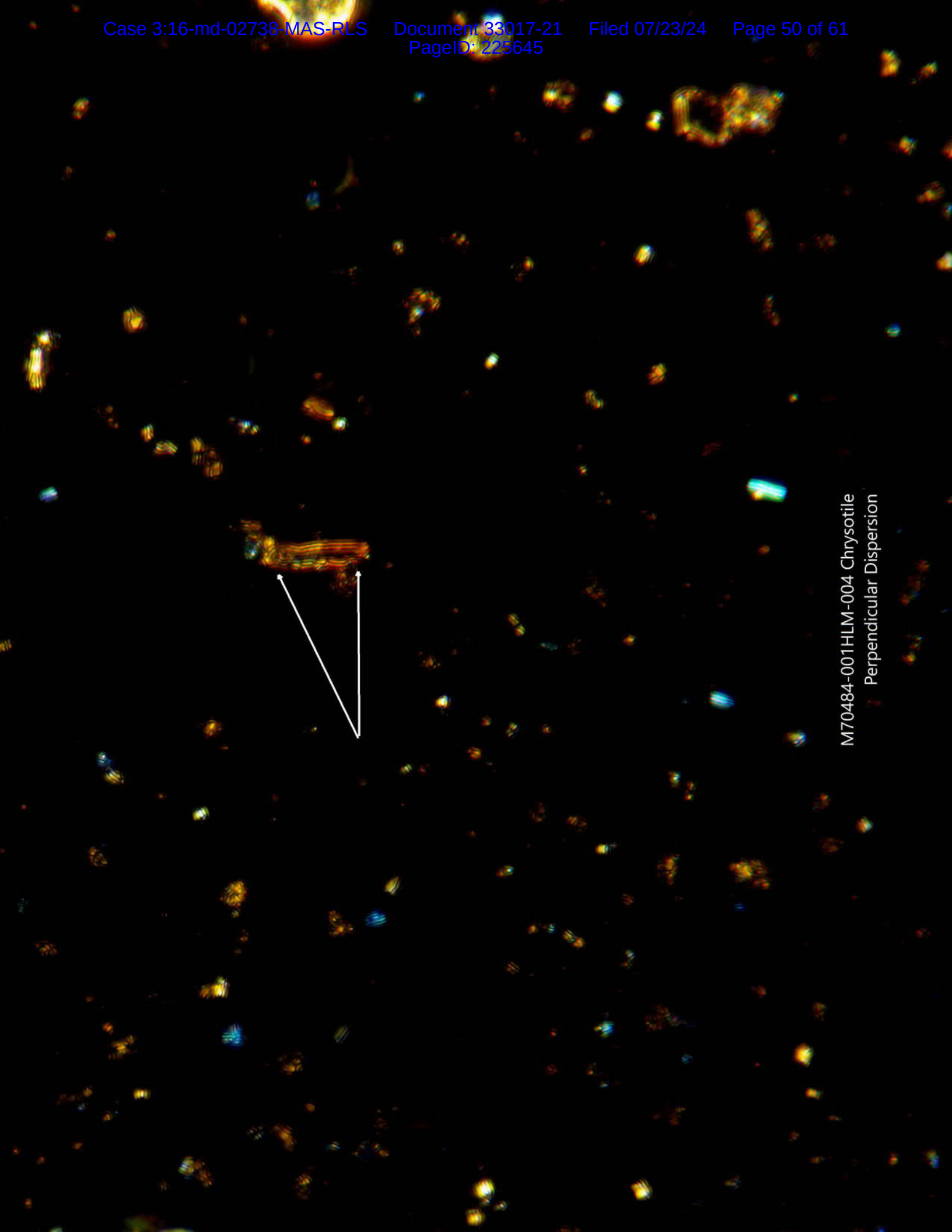
Polarizer out

Aperture Diaphragm 95% closed

1.550 R.I. @ 400X

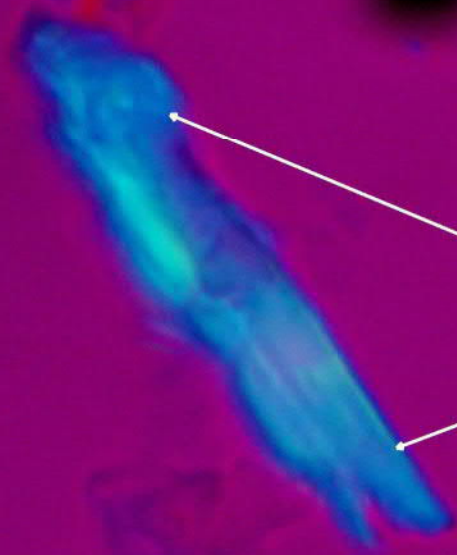


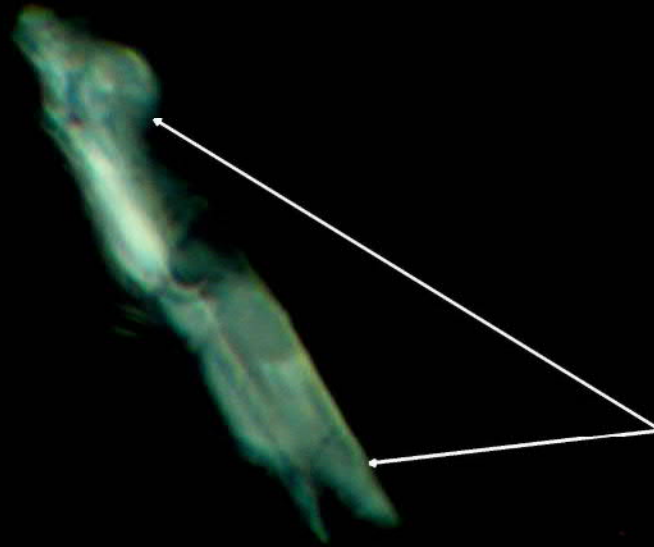
71.9µm

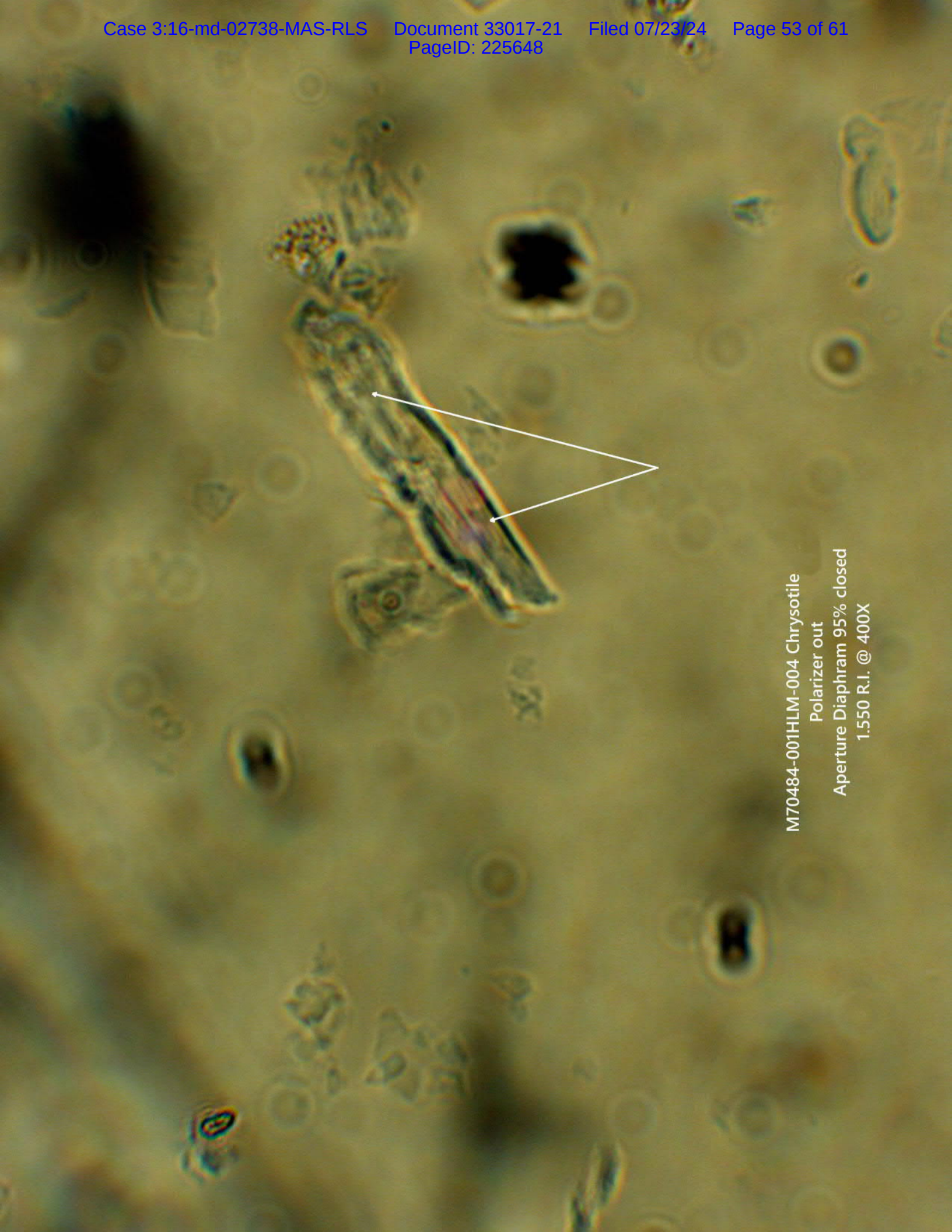


M70484-001HLM-004 Chrysotile  
Perpendicular Dispersion



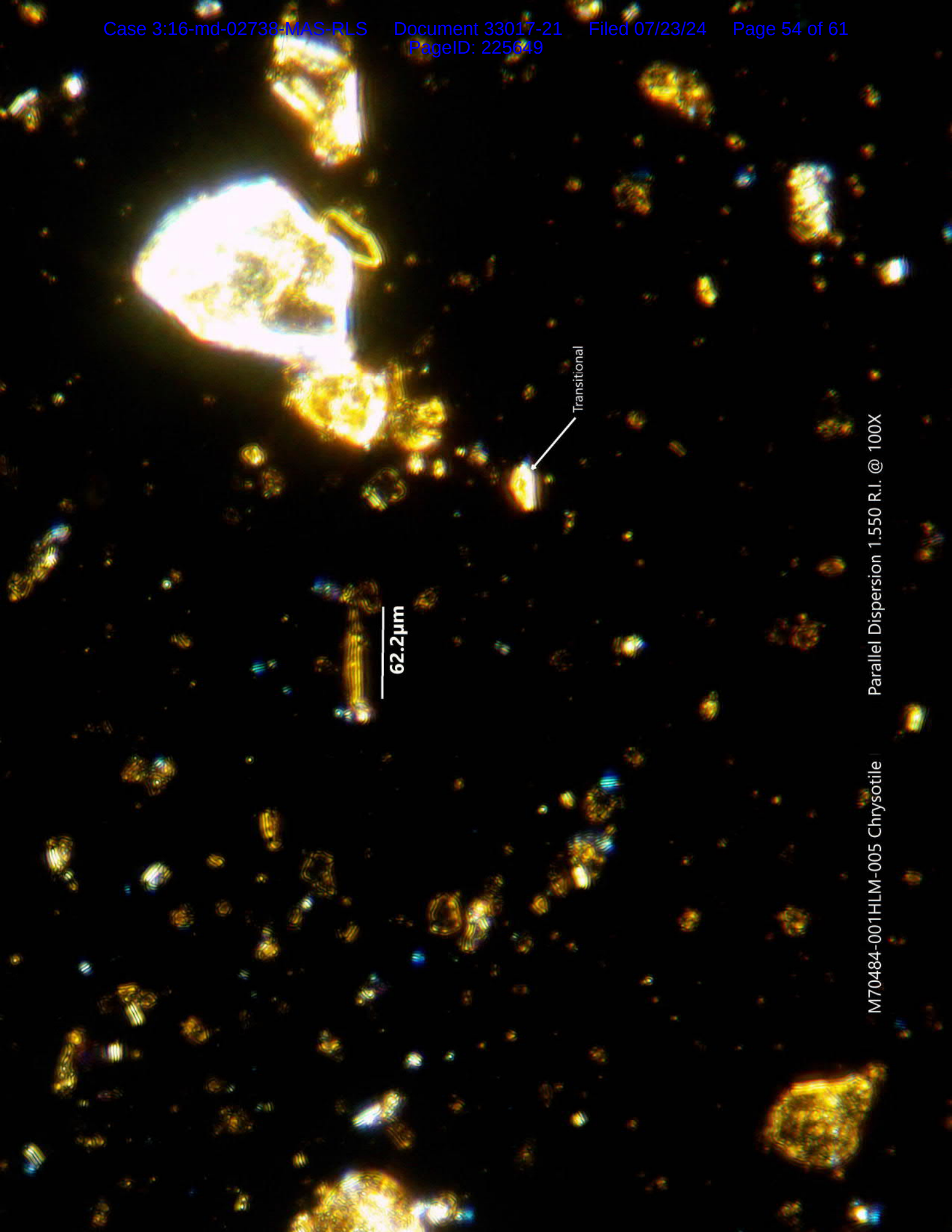






M70484-001HLM-004 Chrysotile  
Polarizer out  
Aperture Diaphragm 95% closed  
1.550 R.I. @ 400X



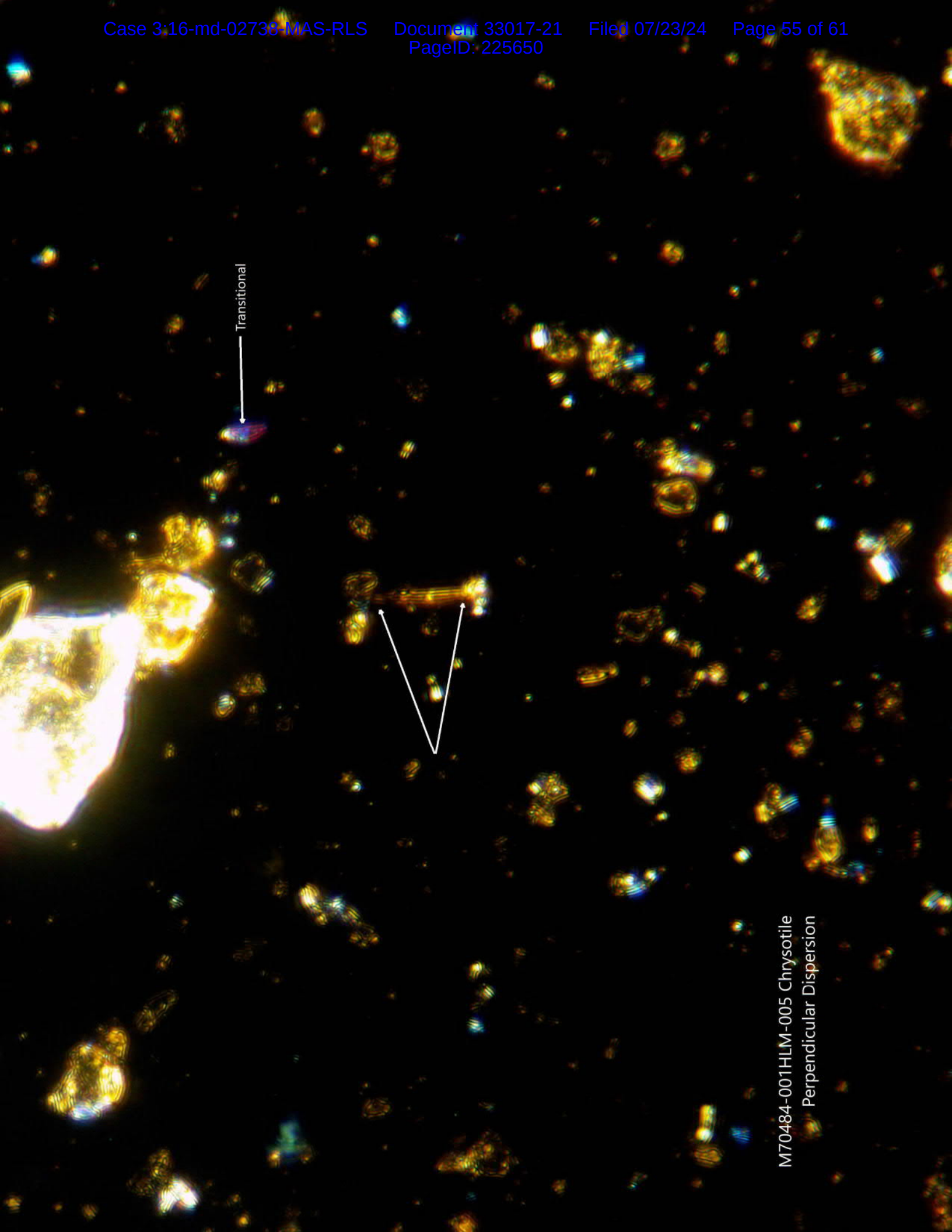


62.2µm

Transitional

Parallel Dispersion 1.550 R.I. @ 100X

M70484-001HLM-005 Chrysotile

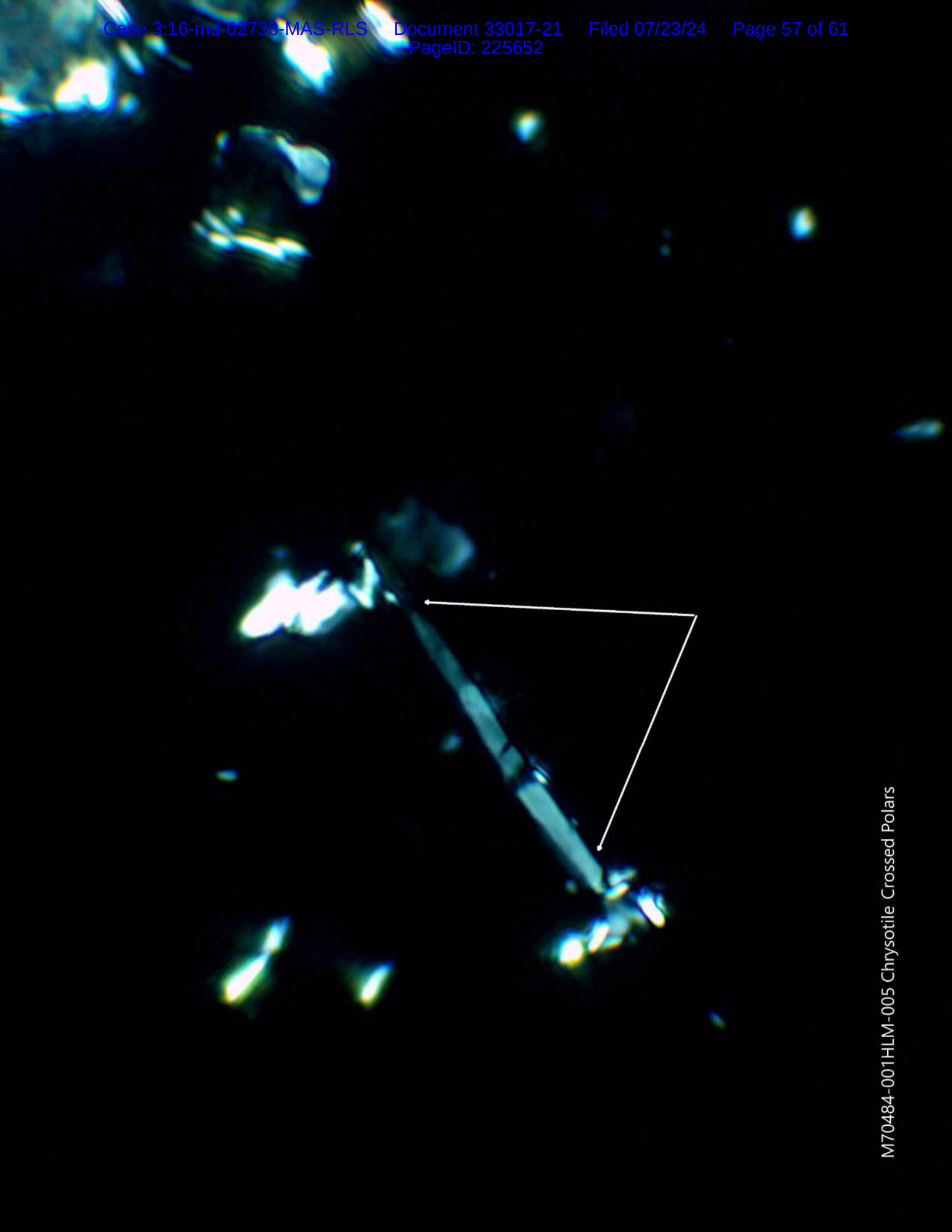


Transitional

M70484-001HLM-005 Chrysotile  
Perpendicular Dispersion





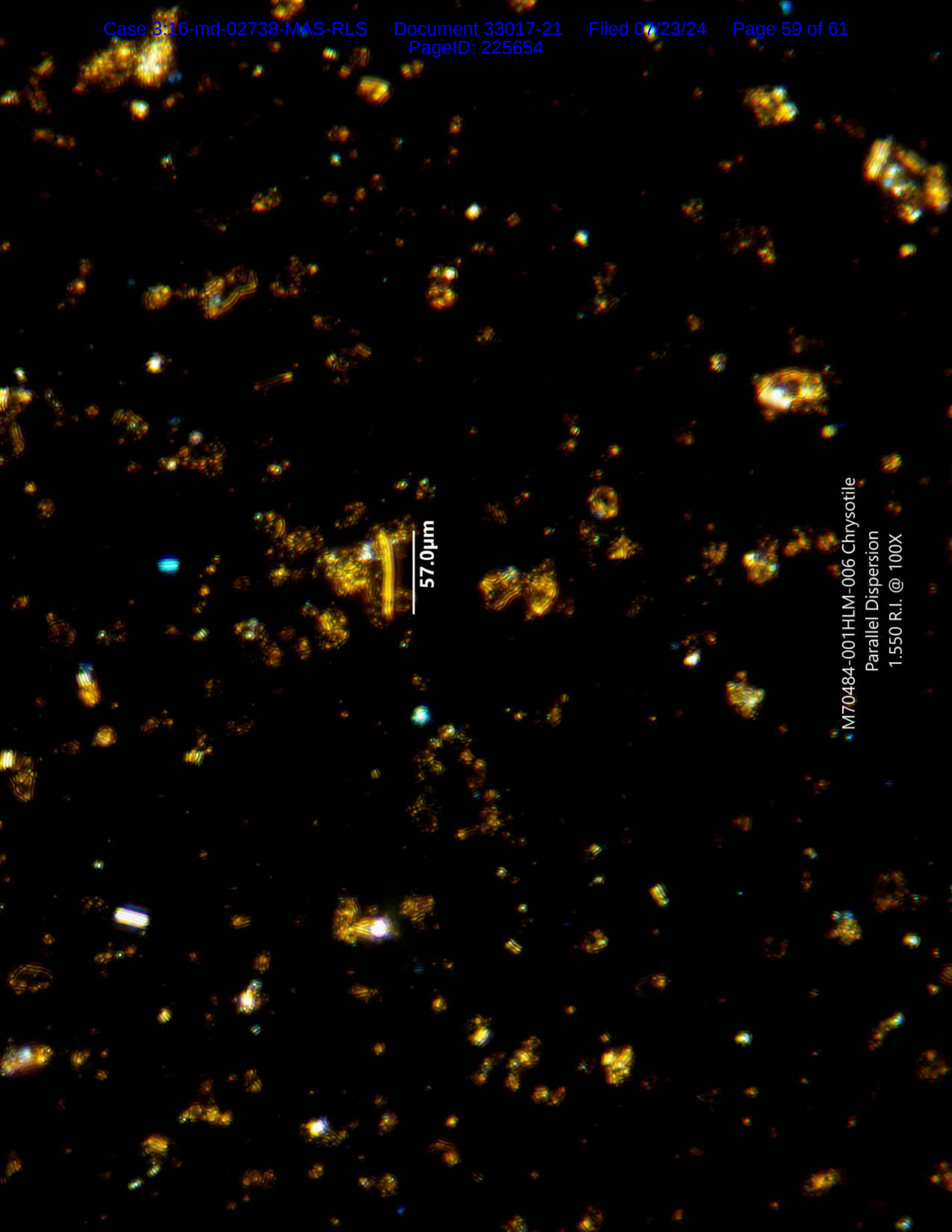




A micrograph showing a single, long, thin, and slightly curved Chrysotile fiber. The fiber has a distinct longitudinal structure with alternating light and dark bands. It is surrounded by a field of smaller, circular, and somewhat irregular particles, likely asbestos or other mineral debris. The background is a uniform, light brownish-yellow color. A white arrow points from the text on the right to the fiber.

M70484-001HLM-005 Chrysotile  
Polarizer out  
Aperture Diaphragm 95% closed  
1.550 R.I. @ 400X

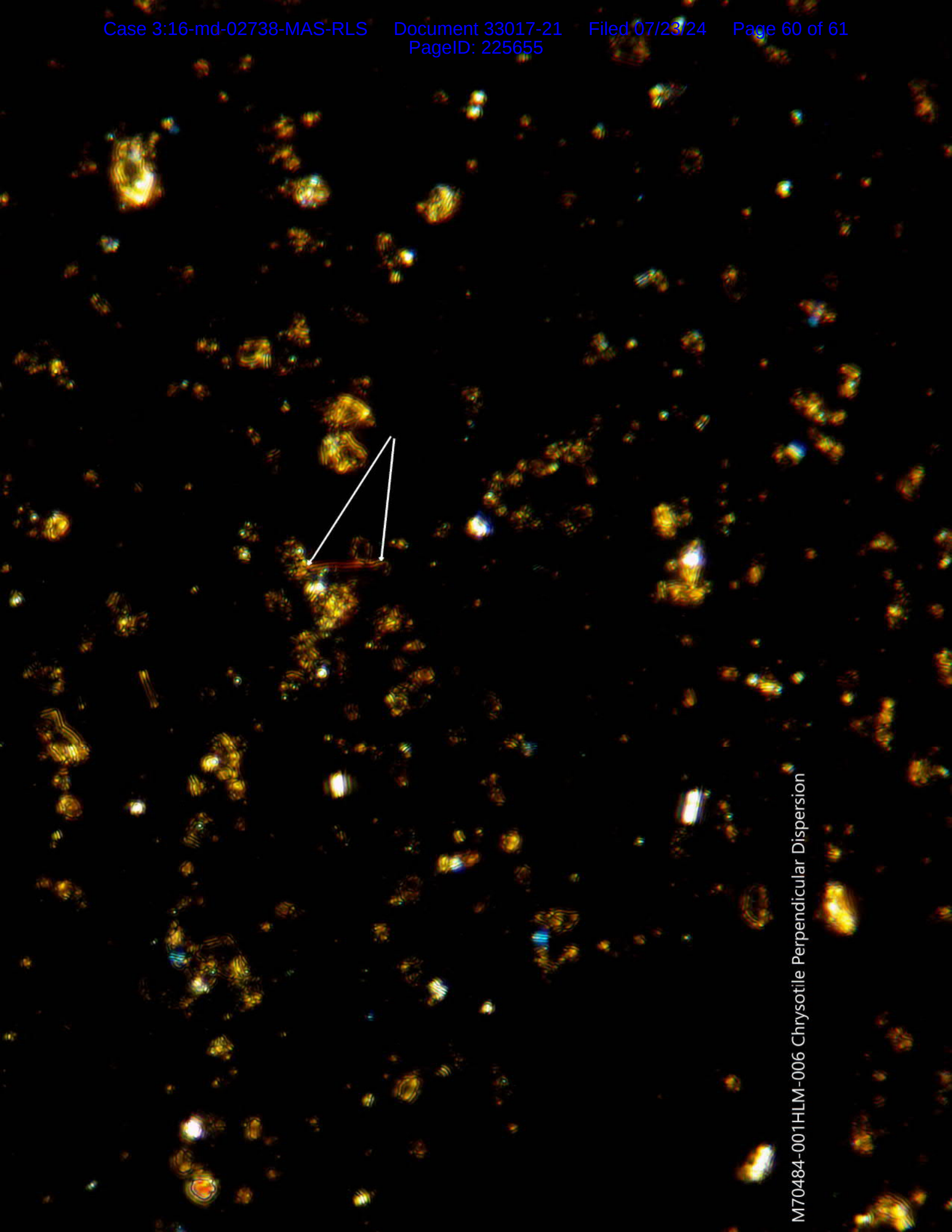




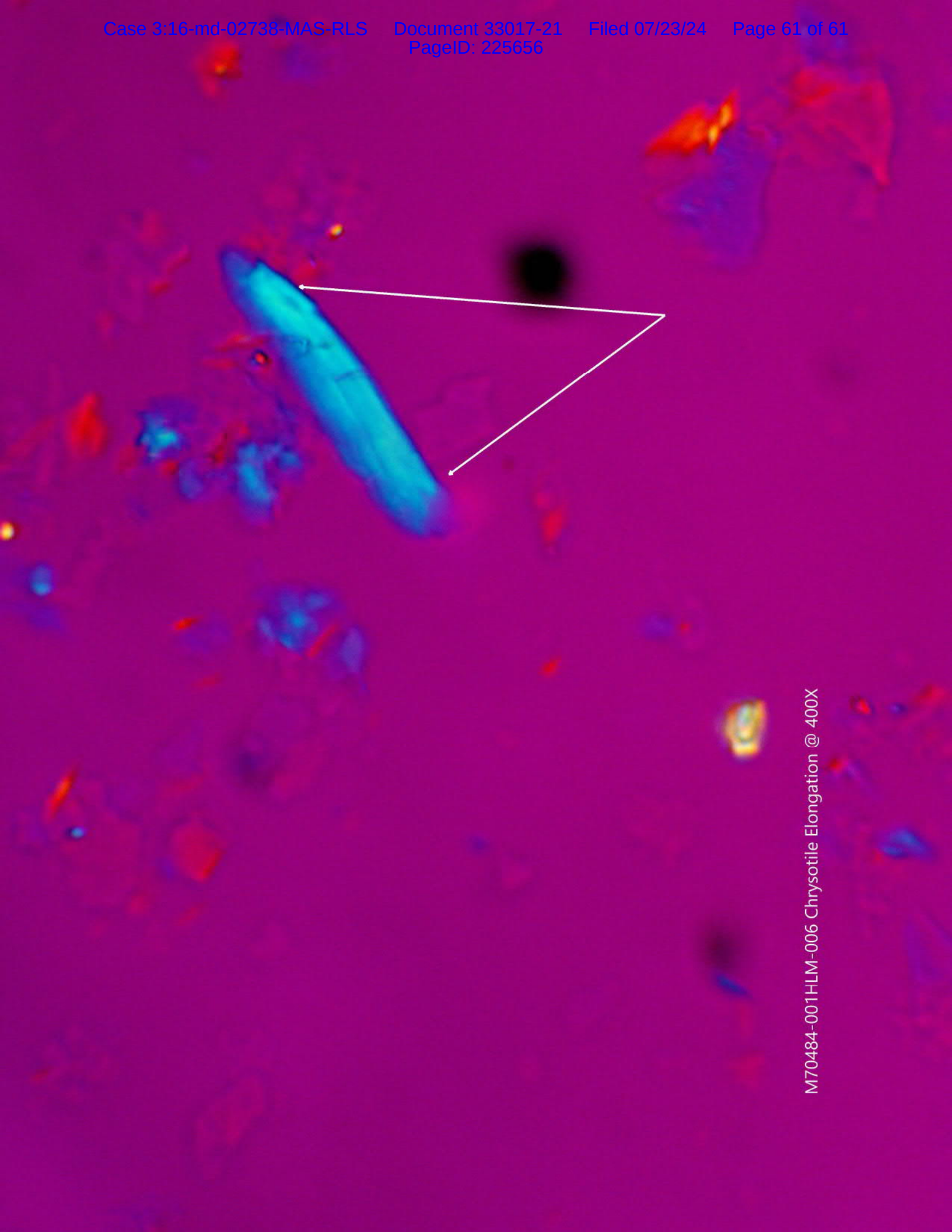
57.0µm

M70484-001HLM-006 Chrysotile  
Parallel Dispersion  
1.550 R.I. @ 100X





M70484-001HLM-006 Chrysotile Perpendicular Dispersion



M70484-001HLM-006 Chrysotile Elongation @ 400X